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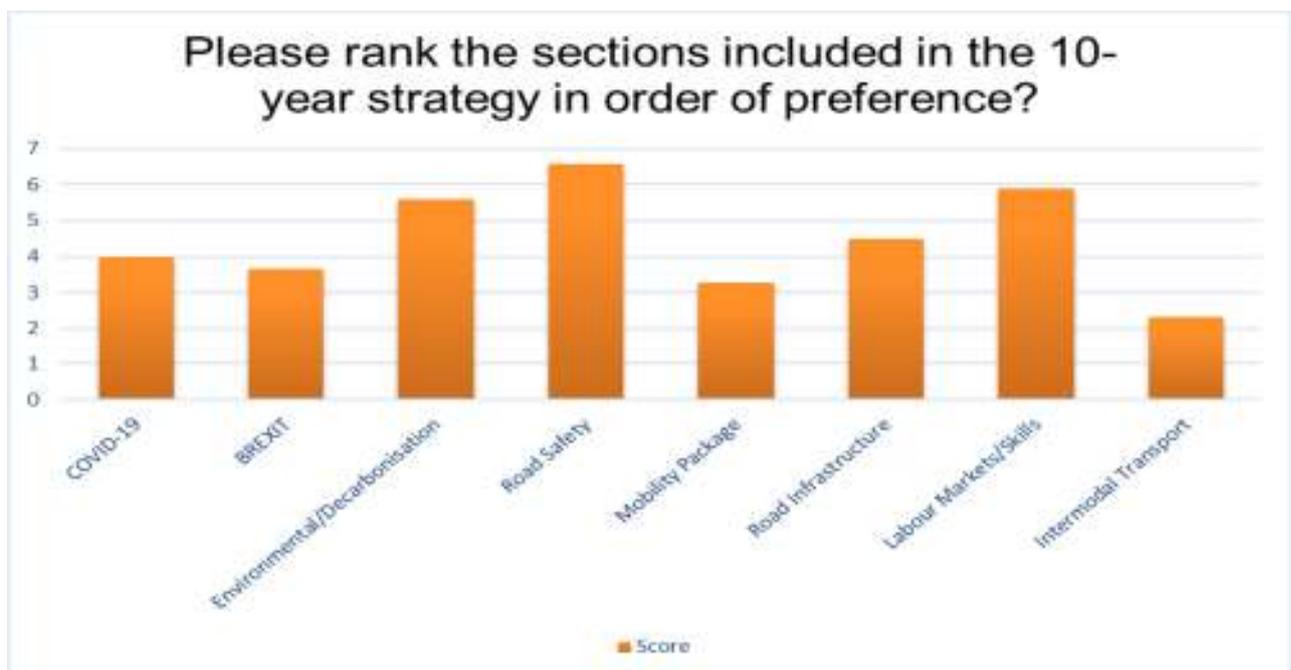
July 2021

RE: 10-YEAR HAULAGE STRATEGY

The Freight Transport Association of Ireland (FTAI) welcomes the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document¹ and we appreciate the opportunity to submit our views for consideration. We offer the observations of our membership on the priorities for Government. FTAI membership covers all aspects of private and public freight transport, passenger transport and logistics supply chain, including road, rail, sea and air and represent some of the largest freight and passenger operators in Ireland, with more than 25,000 employees and 10,000 vehicles operating between them. Core to our Association is engagement with stakeholders that can work collaboratively to raise the profile of the freight distribution and logistics sector and to recognise those companies that operate to the highest levels of professionalism and compliance.

A 10-year strategy for the haulage sector is very welcome, and it is important to highlight at this juncture that FTAI consider our response relates to all those that operate fleets of heavy commercial vehicles (HCVs) over 3.5 (metric) tonnes (3.5t) gross vehicle weight, including the own account sector as well as those operators that have operator licences.

FTAI members have identified the sections contained in the 10-year strategy in the following order of priority.



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



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|------------------------------------|-------------------------|
| 1. Road Safety | 5. COVID-19 |
| 2. Labour Market / Skills | 6. Brexit |
| 3. Environmental / Decarbonisation | 7. Mobility Package |
| 4. Road Infrastructure | 8. Intermodal Transport |

Our submission will provide detailed answers to the questions posed in relation to the 8 defined sections, COVID-19; Brexit; Environmental/Decarbonisation; Road Safety; Mobility Package; Road Infrastructure; Labour Market/Skills; and Intermodal Transport. The submission also outlines a synopsis of other topics/points that are not directly referenced in the consultation document but which the FTAI feels are important to consider.

Additional Points for Consideration

Minister of State at the Department of Transport with special responsibility for International and Road Transport and Logistics²

With climate change, the COVID-19 pandemic and the UK's departure from the EU, there has never before been such pressure placed upon supply chains and logistics in Ireland. The industry needs dedicated and expert leadership to face these unprecedented challenges. The appointment, in June 2020, of a dedicated Minister of State with special responsibility for transport and logistics was very welcome but this position must be elevated to a full Cabinet position. As an island nation on the periphery of Europe, if we are to develop our global brand and become world leaders in logistics, more emphasis and supports must be forthcoming from our Government. The Covid Pandemic and Brexit have served to create sustained awareness of the intricacies and complexity of the supply chain. The freight distribution and logistics sector is worth €6.5 Billion of Gross Value Added (GVA)³. According to the recently published report Logistics and Supply Chain Skills Group⁴ Annual Progress Report (December 2020), 103,000 people are employed in selected transport and logistics roles (33% are drivers and transport operatives). Having a Minister with responsibility for the freight distribution and logistics sector will ensure that Ireland is supporting job creation for the industry as well as affording the requisite recognition that Ireland's freight distribution and logistics sector is critical to our continued economic sustainability and success.

10-Year Strategy

It is welcomed that the proposed strategy will provide the haulage sector with a long-term perspective. Business cycles are generally understood to play out over a 7 – 11-year period. Because of the pace of change within the freight distribution and logistics sector, Brexit, COVID-19, EU Green Deal, technological advancements, etc. the approach to this strategy must be dynamic and facilitate periodic reviews and updates.

- FTAI expect the strategy will be published by Government or the Department of Transport. The strategy should clearly set out the key actions underpinning it, the desired outcome and how success will be measured, as well as the Lead Agency / Department, the person with responsibility within that Agency / Department, the target completion date and any supporting Department / Agency.

² <https://www.gov.ie/en/organisation-information/9b5048-government-ministers/>

³ Source: National Income and Expenditure 2019, CSO

⁴ www.gov.ie - Logistics and Supply Chain Skills Group (www.gov.ie)



The monitoring arrangement must be made clear e.g., in the case of the Road Safety Strategy, the Road Safety Authority (RSA) is responsible for ensuring the Road Safety Strategy is flexible and responds to changing circumstances, as well as reporting progress annually to the Minister for Transport. Who will carry out the corresponding responsibilities in the case of the strategy for the haulage sector?

The Ministerial Committee on Road Safety has also played a critical role in monitoring the progress of the Road Safety Strategy and similarly there is a cabinet sub-committee on insurance reform. Because of the cross departmental functions which impact on the haulage sector FTAI believes an appropriate monitoring role involving Government Ministers should form part of the monitoring arrangements and would be hugely instrumental in steering the delivery of the strategy.

As well as an annual progress report, there should be a mid-term evaluation of the strategy to provide an opportunity to assess and recalibrate priorities and targets.

BREXIT ADJUSTMENT RESERVE

Ireland will receive more than €1 Billion⁵ from the Brexit Adjustment Reserve, the largest allocation to any Member State. Ireland, as an Island nation, is reliant on effective and efficient sea/ferry connections to continental Europe. As a consequence of Brexit, since the 1st January 2021, all in the freight distribution and logistics Industry (the haulage sector in particular) have been displaced from availing of the UK Landbridge to direct routes to and from continental Europe. The alternative direct routes are more expensive for industry and susceptible to inclement weather where ferries are frequently cancelled during the Autumn and Winter months. In addition, there is insufficient capacity on routes to strategically important destinations in Europe for Irish importers and exporters. Dunkirk / Rosslare is the only new route that is a viable and an effective alternative to the Landbridge. The Landbridge option is compromised because of requirements for transit under guarantee bonds, additional permits and uncertainty around delays at ports, and special requirements for the movement of products of animal origin, all resulting in increased costs. FTAI believes on-going supports are required post Brexit, some of which could initially be funded from the Brexit Adjustment Reserve:

1. Invest in Driver Facilities at our ports – In Dublin T11 does not have adequate facilities for drivers, particularly for the volume of drivers having to stay with the loads for long periods of time. Facilities need to be constructed to look after the welfare of drivers to include overnight accommodation; shower facilities; appropriate rest areas and provision of food services. (Drivers are currently asked to sleep in trucks that are not designed with sleeping quarters).
 - a. Facilities for hauliers at ports must improve as a matter of urgency to provide for the following:
 - i. Sufficient parking for dropping trailers and queuing for ferries.
 - ii. Improved social facilities for drivers to ensure that where long delays are encountered there is the ability to freshen up, have a substantial meal and rest area available that is comfortable.
 - iii. Traffic management by all regulatory bodies considering the obligations of hauliers to meet working time and tachograph rules.
2. The new [post Brexit] trading environment dictates that all working in the haulage sector must be upskilled. Money should be allocated to the haulage sector to subsidise active participation

⁵ <https://www.dfa.ie/news-and-media/press-releases/press-release-archive/2021/june/ministers-coveney-and-byrne-welcome-brexit-adjustment-reserve.php>



in training courses focused on Brexit related issues and relevant to their sector. These courses should be certified and include courses on topics such as; Customs; International distribution to third countries and movement of Agri-foods; Supply chain adaptation; Understanding the haulage sector etc. Given the critical nature of our new trading requirements with the UK and the implications for the Irish Economy, designation of funding will act as a vital incentive to aid the freight distribution and logistics sector to upskill as necessary in response to Brexit. It will have the added benefit of reducing the strain on the State Agencies charged with monitoring the compliant movement of goods between Ireland and the UK.

3. Trusted Trader Programmes - The trade agreement alludes to Authorised Economic Operators (AEO) status and the continued recognition for such schemes within the UK. However much more information and guidance needs to emanate from the EU and UK about the benefit of these programmes and what simplifications they deliver. Funding and support should be provided to industry to incentivise businesses to attain trusted trader status.
4. Connectivity with Continental Europe - Brexit has delivered increased supply chain complications for trade between Ireland and the UK with little or no time to prepare for the introduction of new customs systems and processes. The traditional route to continental Europe via the UK Landbridge is not as appealing resulting in increased demand for direct services between Ireland and continental Europe. The recently published (November 2020) IMDO report 'A Re-Assessment of Irelands Maritime Connectivity in the context of Brexit and COVID-19 Challenges' highlighted that there was enough capacity on direct routes (pg4) and asserted that increased demand would be met with extra services. The fact that hauliers with bookings on direct services are being bounced because of overbooking demonstrates that this theory has been challenged. FTAI recommends that the Department of Transport urgently review the situation and provide an updated assessment of connectivity for the Irish supply chain. There is over demand for direct services to continental Europe with limited capacity in an unusually quiet period, if capacity isn't increased urgently the Irish supply chain will struggle. As ferry operators cancel bookings on Ireland / UK routes a temporary solution would be to divert extra ferry capacity onto the continental routes to alleviate some of the pent-up demand.
5. Rosslare - Dunkirk route - This service is more expensive than other connections to Cherbourg and considerably more expensive than the UK Landbridge. The Brexit Adjustment Reserve should be used to subsidise the additional cost to hauliers. The Reserve is aimed to counter adverse consequences in Member States and sectors that are worst affected. All the issues Ireland faces; the additional cost both in time and administration red tape; and the increased cost to market, is providing more difficulties for the freight distribution and logistics sector. A system similar to a Public Service Obligation should be established as it would act to reduce the significantly higher costs for haulage operators to access continental Europe. The EU Commission confirmed that no one member state should be discommoded more than another. Ireland's geographic location and our reliance on the UK Landbridge results in the country being more discommoded than other member states when it comes to connectivity with continental Europe.
6. IT Systems – There is too much duplication required in providing the requisite information for the different state agencies This is a consequence of IT systems across the state sector not being able to effectively and efficiently share information. As an example, the Health Service Executive (HSE) requires the following information that is already provided to Customs:
 - a. SAD (Revenue Documentation)
 - b. Commercial Invoice
 - c. Bill of Lading
 - d. Packing List
 - e. Delivery Address
 - f. Country of Origin of the products



Each state agency is working in their own silo and not sharing information meaning that whilst Revenue will have been submitted all the Customs information this all has to be duplicated for the HSE (for products of non-animal origin) and the Department of Agriculture, Food and the Marine (DAFM) (for products of animal origin)

Funding should be provided to simplify the IT systems and ensure that there are connectivity controls that facilitate transfer/importation of duplicate information. None of these requirements (including Safety and Security) were developed with the levels of volumes between the EU and UK trade in mind. APIs need to be developed to ensure interconnectivity of State IT systems. The UK / HMRC and Irish systems should also be interoperable. The net result of the current situation is that companies must have access to and pay for numerous different systems. It is also taking a serious amount of time to process all of this information and this cost is very prohibitive, particularly for small to medium sized businesses.

CODE OF PRACTICE

FTAI recommend that consideration be given to develop a code of practice for the Haulage Sector similar to the code of practice developed by the HSA for the Agriculture Sector⁶. The code of practice would provide clear guidance to the sector on their health and safety obligations as well as containing key guidance on compliance consideration for drivers specific to their roles as a professional driver including information on safe and secure loading; tachograph and working time requirements; reversing; coupling and uncoupling trailers.

The 2005 Safety Health and Welfare at Work Act allows employers with three or less employees to comply with the terms of a Code of Practice as an alternative to preparing a written Safety Statement⁷. Of the 3,802 Operators licenced with the Department of Transport, 2,495 (66%) have three or less HGVs. Whilst the number of HGVs in a fleet does not necessarily determine the number of staff in full time employment, the predominance of this size operation within the haulage sector justifies the requirement for a code of practice written specifically for the sector. Creating a document that contains user-friendly guidance in respect to haulage operations, employers and employees, contractors and persons with a role related to health and safety will provide a simple approach through the risk assessment document to managing safety. This will have the benefit of ensuring as many small businesses as possible will understand their minimum legal obligations as employers that will have the net result of improving the safety of the businesses, improved road safety and more of a level playing pitch of compliance for this cohort of the haulage sector.

HEALTHY EATING CAMPAIGNS

The Driving for work [www.drivingforwork.ie] initiative, a joint venture with the RSA, HSA and An Garda Síochána, has published guidelines on 'Driving for Work – Healthy Driving Guidelines'⁸. This publication introduces awareness around fatigue, medical fitness to drive, implications of stress on driving and other issues including information on diabetes. This programme should be expanded to include all stakeholders and industry representatives in a campaign to highlight the importance of healthy eating and taking appropriate rest breaks for the haulage sector. Transport Infrastructure Ireland (TII) is charged with ensuring there are appropriate facilities on our motorway network (in response to guidelines from the EU commission). There is also an opportunity to work with TII to develop a robust campaign that promotes the following:

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https://www.hsa.ie/eng/Publications_and_Forms/Publications/Agriculture_and_Forestry/Farm_Safety_Code_of_Practice_Risk_Assessment_Document.pdf

⁷ https://www.hsa.ie/eng/Your_Industry/Agriculture_Forestry/Overview/Agriculture_Code_of_Practice/

⁸ http://drivingforwork.ie/wp-content/uploads/2017/10/Driving_for_Work-Driver_Health_Guidelines.pdf



- Facilities on Motorway networks
- Fatigue awareness and triggers to be aware of
- Healthy eating options for drivers
- Eating areas for those that bring their own packed lunch.

It is so important that service rest area services predominantly promote healthy choice for those who drive for work.

OPERATOR LICENCING

FTAI has long championed the introduction of an operator licence for the own account sector that would standardise minimum requirements for the running of commercial fleets. The Road Safety Strategy 2013-2020 (Action No. 88) placed responsibility on the Department of Transport (then the Department of Transport, Tourism and Sport) to review the policy on licensing of road transport operators to assess if own account operators should be added. FTAI supported this Action, and, in order to inform discussions, submissions, recommendations and decision making relating to the licensing of road transport operators, calls on the Department to publish this review and the conclusions.

88.	Review policy on licensing of road transport operators to assess if own account operators should be included.	DTTAS	Secretary General	Q3 2014	RSA
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A review of the current resources allocated to the enforcement of the operator licence regime, to include the body responsible for this enforcement, should be carried out as a matter of urgency. Consideration should be given to the establishment of an agency (or a body within the existing structures) with responsibility for the licensing and regulation of those who operate heavy goods vehicles (HGVs), buses and coaches.

We recommend that a Traffic Commissioner regime be introduced similar to that in the UK. This body would serve the purpose of ensuring only competent and reputable people operate within the haulage sector. Fair and effective enforcement is critical for fair competition in the marketplace, taken action on those operators that flaunt the rules/law and supporting those companies that operate in a professional and compliant manner.

This body could also be resourced to carry out periodic compliance audits to ensure that operators are meeting all their requirements as detailed in the operator licence application in respect to place of business, parking facilities for HGVs, financial standing and good repute.

The impact of under resourced enforcement is that there is an element of unfairness for operators that invest in compliance. Those that flaunt the rules run high risk operations that create a distorted marketplace which does not support the welfare of drivers or the reputation of the industry. Whilst a minority of operators operate in this way, fair enforcement is essential in supporting the reputation of the industry and will also result in attracting new entrants to the industry.

Abnormal load permitting - Centralisation of the permit system would reduce the administrative workload for the haulage sector and could also lead to greater consistency in applying restrictions around the likes of hours of movement and requirements for escorts.



ENFORCEMENT

The current number of members of An Garda Síochána attached to Road Policing Units is just over 700 strong. This number is not sufficient to facilitate fair and consistent quality enforcement. During the years of austerity, the numbers allocated to Roads Policing reduced considerably and the absence of specialist training has resulted in a skills shortage when it comes to Garda enforcement of the haulage sector. The upskilling of Garda personnel in commercial transport legislation and regulation is essential in improving and preserving compliance and safety on our roads. Fair and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture within the freight distribution and logistics sector that recognises the legislation and the regulations underpinning a fair, competitive safer environment for all. There is also a significant role to be played by all agencies charged with enforcing the laws of the land, including the RSA and the Health and Safety Authority (HSA), with a requirement for the allocation of sufficient resources as well as ongoing collaboration.

GRADUATED FIXED PENALTIES

FTAI recommend that Graduated Fixed Penalties are considered as an effective and efficient means of enforcement for driver's hours offences, minor roadworthiness and other issues such as overweight and over height vehicles. Fixed penalties provide an efficient, proportionate, and direct way of dealing with a wide range of road traffic offences. The rights of individuals to challenge alleged offences in court are preserved, but the number of cases brought before the courts should be substantially reduced. Graduated Fixed Penalties have worked well in the UK for years and the VOSA guide⁹ provides good detail on how their scheme works. The result of the introduction of this scheme would be to develop a consistent level of compliance for all operators of commercial vehicles and international visitors to these shores. In addition, a key benefit would be to reduce the strain on the court system and the time taken by RSA and Garda personnel preparing for and attending court.

DRIVER SHORTAGE

The shortage of HCV drivers in Ireland, and indeed across Europe, has been well documented. The consequences of Brexit and COVID-19 have had a further detrimental impact in terms of the FTAI's membership and particularly HGV fleet operators who cannot recruit enough qualified drivers to meet their demands. One option for sourcing drivers is South Africa where, as in Ireland, they drive on the left-hand side of the road and the population is English speaking. At present four countries outside of the EU/EEA are covered by mutual recognition agreements for CE/C1E driving licences – South Africa, Australia, Japan and South Korea.

- The list of countries covered by mutual recognition agreements for CE/C1E driving licences should be extended to include countries where there is clear evidence that Ireland has appealed to their residents as a working destination for other trades e.g., Brazil, the Philippines and India.
- The Irish State should do more to entice such HCV drivers in the UK to move to Ireland for work rather than return to their home nations.
- There are too few young people embarking on a career in HCV driving. The industry needs to become attractive from a remuneration and professionalism perspective. Government and industry need to work collaboratively to help rebrand the industry and promote HCV driving

⁹ https://www.freight-train.co.uk/downloads/VOSA_GFPN_guidance.pdf

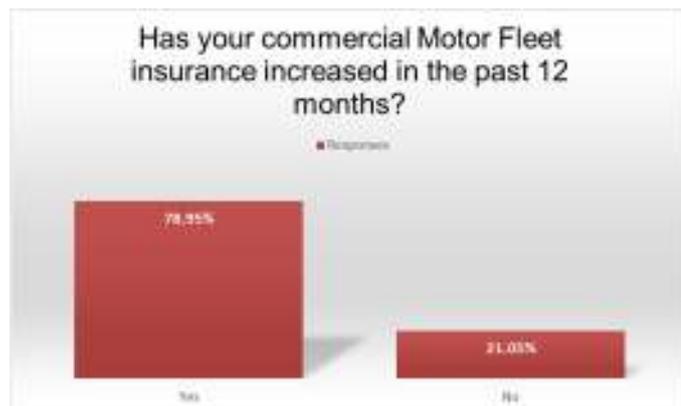


as an attractive and viable career choice. FTAI is already actively engaged in raising awareness of the issues and working with Higher Education Authorities as well as SOLAS to help make this happen.

INSURANCE

FTAI recognises the steps being taken by Government in relation to insurance reform, however, we contend that the commercial fleet sector requires speedier intervention by Government to ensure that more competitive and realistic insurance premiums are available to fleet operators. The increased cost of insurance is having a serious impact on day-to-day operations with little engagement from the insurance sector in proposing solutions to operators in order to garner more competitive rates. The Cabinet committee sub-group on insurance reform, chaired by the Tánaiste and Minister for Enterprise, Trade and Employment, must focus on the commercial motor sector to develop key solutions for this type of insurance. Adoption by businesses of risk management practices must be encouraged, recognised and result in substantial premium savings for operators who conduct their business to the highest standards. On the other hand, those operators who have claims and who do not implement such high standards in risk management and rectification practices should expect to see this reflected in their premiums.

As an Association that has long promoted the highest standards of professionalism and compliance, the lack of prolonged and consistent engagement by the insurance sector in supporting compliant operators is very frustrating. The ‘one brush’ fits all approach to insurance premium assessment is wrong and looks to recoup the losses of the badly performing risks from the majority that work in a risk conscientious manner. Just under 79% of FTAI members have seen their fleet insurance policies increase in the past 12 months. 60% have seen an increase of between 2.5% and 5%. 13% have seen increases of over 5% in the past 12 months.



A key task for the haulage sector, indeed all operators of commercial vehicles is to attract young people into the profession of professional driving. To support this insurance companies must be more open to including fully licenced young drivers on policies at reasonable insurance premium rates. The cost of motor insurance for young drivers on fleet policies is prohibitive and is entirely unjustified. The training and licensing requirements for a professional driver as such that the insurance sector must reconfigure their risk analysis of this cohort to support industry.

DATA COLLECTION

There are many agencies involved in the collection of data and information pertaining to the freight distribution and logistics sector, including the Central Statistics Office (CSO) who carry out periodic commercial transport surveys. However, in the first instance there is a lack of clarity on what constitutes a HGV, and, as a consequence, the actual number of HGVs in operation in the State. This creates confusion and makes it particularly hard for cross referencing. This was identified as an issue



as far back as 2010 in a report published by the 'All Island Freight Forum'¹⁰. We recommend the following should be considered.

- Agree referencing criteria for HGVs based on Gross Vehicle Weight with a HGV being any vehicle with a GVW of over 3,500kg (or 4,450kg for electric vans). (This is already the definition used when requiring drivers to do Driver CPC training and also for vehicles requiring tachographs. It is also used when defining vehicle categories.)

Commercial Vehicles

N1	Vehicles designed and constructed for the carriage of goods and having a maximum mass not exceeding 3,500 kg e.g. light vans and trucks. CVRT tested annually.
N2	Vehicles designed and constructed for the carriage of goods and having a maximum mass 3,500 kg and not exceeding 12,000 kg e.g. larger vans and trucks. CVRT tested annually.
N3	Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 12,000 kg e.g. trucks. CVRT tested annually.

COMMERCIAL VEHICLE OPERATOR RISK INDEX (CVORI)

The Commercial Vehicle Operator Risk Index (CVORI) was introduced by the RSA with the aim of improving the safety of HCVs on our roads, making journeys safer for all¹¹. The basis of the operator risk rating is determined from a number of areas pertaining to roadworthiness and drivers' hours compliance assessed through on-road inspections, on-site inspections and commercial vehicle roadworthiness test results. The risk rating is based on a traffic light system - Red, Amber and Green, with Red being the worst rating. According to the RSA website, operators having a red rating can expect to have a higher number of inspections by the RSA than those having a lower or green rating.

A lot of effort, by both the RSA and the haulage sector, has gone into communications and education around CVORI. Nonetheless, there appears to be a perception within the industry that CVORI has not resulted in those operators who flout the laws being the subject of any greater level of enforcement than those who put the time, effort and investment into compliance. Whether justifiable or not, the existence of such a perception is not helpful in promoting and achieving compliance and the RSA should therefore work closely with the road transport sector to ensure, firstly, CVORI is working as intended, and secondly, the industry is generally accepting that this is the case.

COVID-19

COVID-19 has had a devastating impact on some segments of the freight distribution and logistics sector such as food services (companies that supply goods and services to restaurants and pubs); construction sector (those that manufacture and supply essential construction materials, quarries, steel, timber, windows, insulation etc); private coach and bus sector; International haulage (demand for goods decreased substantially during the restrictions between March and July 2020 in particular, with most operators struggling to make profitable inward (to Ireland) and outward (to the UK and EU)) journeys. This cohort has limited cash reserves and the lack of backloads puts a strain on their sustainability. Other challenges

¹⁰ <https://www.cso.ie/en/media/csoie/releasespublications/documents/transport/2010/AIFF2010.pdf>

¹¹ <https://www.cvrt.ie/en/Operator-Driver-Obligations/Pages/Risk-rating.aspx>



included significant reduction in demand for cash in transit operations; clothing and electrical retailers with suppliers are also suffering.

What lessons can be learnt from the Covid-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Irelands supply chains?

The pandemic has highlighted the resilience of the supply chain to ensure essential products are available and the supermarket shelves are stocked, and critical medical devices and medicines get to those that need them most. However, the pandemic has highlighted an inequality between how the industry is perceived versus other essential services and this must be evaluated. Developing a broader understanding of the intricacies and complexities of the supply chain is important in supporting the industry in times of crisis. The bottom line is, if the supply chain is disrupted the State is at risk due to the unavailability of essential items such as food, water, medical supplies and so on. Developing a strategy that recognises the strategic importance of logistics and preserves the supply chain at all times is the most important lesson from this most recent crisis.

1. There must be more supports for essential workers and recognition for the important role of all within the supply chain including the haulage sector and their drivers. Without haulage there would be no movement of goods and it is incredible that this sector has been able to work so effectively in this time of crisis. The fact that drivers are lone workers is important but the fact that safety controls were put in place to ensure distribution centres were not impacted to support the movement of goods should be lauded. The vaccination programme and the criteria for roll out must be reviewed in future as our international drivers are as important as other essential workers and should be protected to the same degree. As mentioned already, without them the essential medicines, food and clothing would not have reached our markets. All drivers have families who have been very worried (particularly in 2020) about the safety of their family members as they travel around the country and abroad.
2. Better communication from agencies with responsibility and links to the supply chain is critical. Industry requires clear guidance and information, and, while appreciating that COVID-19 was something the likes of which we had not experienced before, this was slow to emanate from key stakeholders such as the RSA, HSA and the Department of Transport. Industry specific guidance is required. In the early stages of the crisis the following issues were common:
 - HSA: The Authority did not demonstrate a clear understanding of their role in managing the pandemic particularly in relation to the freight distribution and logistics sector. There was a distinct lack of guidance on generic COVID-19 risk management requirements provided by the Authority.
 - RSA: Conscious of how quickly COVID-19 was thrust upon us, nonetheless, changes to inspection regimes, commercial vehicle roadworthiness testing, tachograph management were slow to be implemented. The requirement for Ministerial approval for implementation of changes necessary to protect both the commercial fleet sector and the staff of the RSA created a delay which resulted in uncertainty and confusion within the industry.
3. The supply chain is complex and both resilient and fragile at the same time. We see examples of the fragility with the 'EverGiven' container carrying vessel blocking the Suez Canal and the long-term consequences of our reliance on super cargo ships, and evidence of the resilience in the fact that our supermarket shelves have been stocked and essential Personal Protective Equipment (PPE) and medical equipment and medicines (including Vaccines) have moved without disruption.



Where the State and businesses source their products has come to be examined. The pandemic commencing in different regions at different times has meant severe complications for the manufacturing and production processes. The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. Having a plan 'B' is essential in preserving the supply chain integrity. Whilst the world has been made smaller due to air travel and sea and rail connectivity, the fact is that if you source products closer to home the less complications in the event of a crisis. In any event it is critical that movements for essential supply chain continue in a safe and secure way and that the freight distribution and logistics sector continue operating in times of crisis. Open channels of communication with government in this instance are critical.

The pandemic has shown that the logistic sector is the life blood of the economy, keeping things moving. To support the critical services the industry provides, support is required including storage space and reliable infrastructure.

Lead times, alternative supplies etc are arguably all commercial matters.

The Just in Time logistics model has been challenged. We need to consider:

- Storage space
 - Lead in times
 - Location of supply
 - Alternatives supply options
4. The pan European guidance model worked with varying degrees of success! It was obvious in the early days of the importance of keeping road freight moving throughout Europe. The issues arose as individual Member States implemented differing border controls and checks. The establishment of the Green Lane guidance by the EU Commission was welcome as it provided clarity and stability of approach to keeping borders open for essential traffic, or so we thought. Member States adhered to the guidance in a variety of ways with France ignoring it completely with the introduction of mandatory antigen testing requirements for essential workers.

National and EU wide emergency response committees to include stakeholders from the freight distribution and logistics sector must be established to develop a coherent emergency response plan that can be implemented effectively in times of crisis that would include, pandemics, threats to ports/airports (points of entry); bad weather events.

National and EU wide emergency response committees to include stakeholders from the freight distribution and logistics sector must be established to develop a coherent emergency response plan that can be implemented effectively in times of crisis.

Are there any suggestions for policy support to address the challenges that have been experienced as a result of the covid19 pandemic?

1. The Office of Emergency Planning supports the Minister for Defence who chairs the Government Task Force (GTF)¹² on Emergency Planning. Creating a sub-group with representation from the freight distribution and logistics sector is essential in ensuring comprehensive preparations for, and response to, all emergencies.

¹² <https://www.gov.ie/en/publication/7ff6f-strategic-emergency-management-sem-national-structures-and-framework/>

Emergency Planning: Creating a sub-group with representation from the freight distribution and logistics sector is essential in ensuring comprehensive preparations for, and response to, all emergencies.

This sub-group should include the Department of Transport, and key stakeholders within the logistics sector. The sub-group should commence work immediately and form part of the national emergency planning in the event of future pandemics as well as for example -

- Very bad weather and accessibility issues
 - Strategic ports becoming inoperable and continuing to meet the need to maintain connectivity.
 - Disaster planning – fuel shortage / explosions / natural disasters.
2. The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging. Both agencies have responsibility for work related vehicle safety and driving for work compliance. All emergencies have consequences for the welfare of employees and businesses and, as is the case with the COVID-19 pandemic, have consequences for the availability of services under their remit such as Commercial Vehicle Test Centres; Driving Test; Tachograph Calibration; welfare of workers and safety issues relating to carrying out normal duties for all within the supply chain. Guidance on the use and requirement for PPE is a core part of the HSA's remit, however their lack of guidance and information on this issue in 2020 created confusion and a lack of certainty within the freight distribution and logistics sector. The industry demonstrated resilience and a commitment to protect the safety of their employees and customers through a safe cleaning of equipment regime; use of face coverings; social distancing and the implementation of innovative safe operating practices.
3. More flexibility to alleviating the expense associated with operating a commercial fleet should be forthcoming from authorities in the event of any future pandemic or similar type crisis. Particular consideration should be given to operators who, as consequence of the crisis, have to temporarily park up their fleets, partly or wholly, because services they provide are not needed e.g., those servicing the entertainment sector; hospitality, pub and restaurants. Specific considerations should include –
- In order to help maintain cash flow, provide a mechanism to refund motor tax for vehicles that are declared off the road for any full months of remaining tax covered by the period of the off-road declaration:
 - During the current pandemic significant numbers of commercial vehicles have been taken off road. In the UK they have a system called 'Statutory off the Road Notice' (SORN) that facilitates a rebate of road tax for the period it is off road. In Ireland we have a system of declaring the vehicle off the road, however there is no refund mechanism. In response to this crisis, it would be a welcome relief for commercial vehicle operators that have seen a significant downturn in their business to receive a rebate for declared off the road vehicles. This would be an essential aid to helping companies with cashflow difficulties and aiding their sustainability.
 - Operators will not be able to use the vehicle on a public road until the vehicles are taxed again.
 - Waive toll collection for essential commercial fleets.
 - Commercial Vehicle Roadworthiness Test (CVRT) Regulations provide that where a test takes place after the due date the new certificate is only valid until the date that is 12 months from the due date of the test. For example, if the CVRT certificate expires



in April 2020 and the vehicle / trailer only undergoes a test in February 2021, irrespective of the fact that it has only been off the road for the period April 2020 to February 2021 due to a pandemic or other similar crisis, the new test certificate will expire in April 2021. Therefore, a further test will have to be undergone in April 2021 adding a further cost to the owner. ***Exceptional times call for exceptional measure, and therefore it is recommended that in times of a pandemic or other similar crisis, there should be a legal provision which allows for either the test fee to be waived, or the new certificate to be valid for a period of 12 months (in the example outlined from February 2021 to February 2022).***

- Attainment of driver licences, driver CPC and other certification necessary to carry out the duties of a professional driver and or haulage business must be continued without interruption.
- State agencies charged with issuing motor tax or new vehicle registration / changed of ownership / operator licencing etc. must continue to be resourced and operate throughout the period.

BREXIT

From the point the UK voted to leave the EU in 2016, it was understood that the trading relationship between Ireland and the UK would change beyond recognition. For the first time in modern times, we would not be aligned to deliver frictionless trade. The key objective for those in the freight distribution and logistics sector was for as good a trade deal as possible to be brokered between the two blocks. Ireland was relatively exposed in the event of no deal due to our status as an island and because of our geographic location and reliance on the UK Landbridge for efficient connectivity to continental Europe. FTAI was pro-active in supporting our members with training and highlighting the potential complications for movement of goods once the UK formally left the EU customs union and single market. The lack of certainty over the years prior to the Trade and Cooperation Agreement delivered at the end of December 2020, just seven days before the official end of the so-called transition period, resulted in businesses being at varying degrees of preparation. Following the 1st of January 2021, it became very evident that UK businesses were very unprepared which had the knock-on negative impact on Irish businesses reliant on them.

Brexit has delivered the greatest shock to the supply chain in modern times and is challenging all Irish businesses reliant on imports and exports of goods to review their supply chain. Trade barriers, non-tariff barriers, rules of origin issues and barriers for the movement of products of animal origin (POAO) and live animals' administrative barriers have increased the cost of doing business between the UK and the EU. The new complexity and additional cost of using the Landbridge is proving challenging for international haulage operators.

What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

1. On the 24th of December 2020 Ursula von der Leyen said: *"It was worth fighting for this deal because we now have a fair and balanced agreement with the UK, which will protect our European interests, ensure fair competition, and provide much needed predictability for our fishing communities. Finally, we can leave Brexit behind us and look to the future. Europe is now moving on."*¹³

¹³ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2531



- It is accepted that trade with the UK is now more complicated as a result of Brexit and that there are regulatory requirements for additional paperwork, as well as physical and documentary inspections of vehicles, all of which add additional cost and time constraints on the haulage sector. However, for a number of reasons, to date we have not left Brexit behind due to:
 - Lack of Industry Preparation
 - UK businesses were particularly unprepared for 1st January 2021.
 - Stockpiling has provided a distorted view of the impact of Brexit, as has the impact of the COVID-19 pandemic.
 - A limited number of competent qualified customs brokers and agents has resulted in a significant reduction in volumes for the haulage sector.
 - The delayed response by the EU to ratify the trade and cooperation agreement (finally endorsed at the end of April 2021) has delayed the establishment of specialised committees whose roles it is to review the implementation of the agreement and consider easements for the movement of goods.
 - The Northern Ireland Protocol and the unilateral decisions being taken by the UK to prolong easements is creating further uncertainty for businesses during 2021.
- Access to markets is important for an island nation like Ireland. Whilst a significant proportion of our haulage sector is deemed to be International, this is mainly due to the all-island nature of the haulage sector rather than the movement throughout the UK and the EU. There is a need for further integration and upgrading of systems across Government departments / agencies in order to reduce the administrative workload on the haulage sector where the current paperwork requirements result in the duplication of effort in order to provide the information required by state agencies for imports.

There is a need for further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector

- Safety and Security Declarations: The Irish Government must represent the Irish supply chain at European level and press for the opening of negotiations with the UK to remove the requirement for entry and exit safety and security declarations. Entry and exit safety and security declarations appear unnecessary as customs declarations and movement reference numbers (MRNs) are generated and inputted into the Pre-Boarding Notification (PBN) system. If the safety and security declaration was taken out of the process it would deliver significant easements for the haulage sector.
2. Ireland needs to be connected to strategic ports in continental Europe to support our competitiveness within the customs union and single market. The new route from Rosslare to Dunkirk is a welcome start but the cost of the route is proving unattractive for businesses. Whilst increased freight volumes have moved between Ireland and France (mainly into and out of Cherbourg) our key markets are in Germany, Belgium and the Netherlands. Developing strong maritime links with ports closer to these destinations is sensible and should be supported by Government policy. The UK Landbridge, the traditional route for the vast majority of international haulage operators, has become more problematic because of the regulatory requirements imposed by the Common Transit Convention (CTC). In addition, the UK's changing immigration laws have brought an added concern about how foreign



commercial transport operators and drivers will be dealt with in the event that, despite the best efforts of the operators and drivers, illegal migrants are found in their vehicles. Everything must be done to support HCV drivers, who, in view of the importance of the supply chain, must be considered as essential workers, in carrying out their duties in an effective, efficient and safe manner

3. The Authorised Economic Operator (AEO) facility is an important measure that recognises reliable operators and encourages best practice in the international supply chain. Additional guidance needs to be developed for AEOs with particular reference to the benefits of the AEO facility and the critical role of hauliers in the AEO operation.
4. The very much welcomed the appointment of a Minister for State with responsibility for International and Road Transport and Logistics, however FTAI believes the freight distribution and supply chain must be afforded greater recognition within Government. The Brexit Preparation funnel approach by the Government, which provided limited access to the Department of Foreign Affairs and Department of Taoiseach for stakeholders representing the freight distribution and logistics sectors, was short sighted. The impact of Brexit on this sector is profound and, whilst good engagement with the Department of Transport existed, much more engagement with the sector from other Departments with responsibility to Brexit preparation would have been beneficial for all.
5. Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). As per Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013, shipping companies on the Irish Sea have been able to transfer responsibility for safety and security declarations to the haulage sector. This is not the case for movements on the short straits. It is the responsibility of the carrier for this declaration and if the ferry operators took on this requirement it would provide significant easements for haulage operations.
6. This point is linked with good environmental practices. For efficient logistics, sufficient resources should be provided at Irish Ports for parking, road accessibility and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. Codes of practice should be developed to provide minimum requirements to reduce the risk of delays, reduce the risk of traffic queues and reduce the impact on the working time of drivers by making service providers have sufficient space and resources available to carry out their activities in a safe manner respecting the welfare rights of commercial professional drivers. This point is relevant for all stakeholders engaged in activities in Irish Ports including regulatory bodies such as An Garda Síochána, Revenue and the DAFM.
7. Duplication of information required for different state agencies is very burdensome and is creating confusion leading to delays at ports. Synergies between the state agencies assigned with responsibility for customs and border controls. Sanitary and Phytosanitary checks, immigration and other regulatory controls need to be developed and integrated through IT systems. Communication with haulage drivers and companies must improve. In a lot of cases, particularly for unaccompanied trailers, the hauliers are not part of the customs declaration process. The Haulier is the last to know of the reasons for the delay and this is causing frustration. Streamlined IT systems that are fit for purpose with the development APIs that offer more flexibility should be fast tracked. 24/7 technical support is also required to support traders & hauliers moving goods through the border outside of traditional office hours.
8. Citizens of Northern Ireland who live in Northern Ireland but work as the named Transport Manager for an Irish registered Haulage business are no longer eligible to carry out this duty as they do not reside in the EU. This is not the case for residents of Ireland who are free to work as transport managers in Northern Ireland. Section 3.1 of The Common Travel Area states *'The basic principle guiding the operation of the CTA is that the Irish and UK Governments treat each other's citizens in a similar manner to enable them to freely move*



between the two jurisdictions, and thereby reside and work in either jurisdiction, without the need for special permission'. Associated rights, as well as ongoing cooperation between Irish and UK authorities, facilitate and support these arrangements. The uniqueness of the land border between Ireland and Northern Ireland means that these issues are not experienced in any other EU Member State. It is reasonable that the EU Commission should consider facilitating holders of an Irish issued Transport Manager CPC qualification, working in Ireland but living in Northern Ireland, to act as the nominated Transport Manager for an Irish (EU) registered haulier.

How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

1. The importance of a stable political environment is critical to the delivery of trade easements under the trade and cooperation agreement. In the first instance, establishment of the Partnership Council and committees is important in implementing the bi-lateral structures that can consider issues raised. A specialised committee for transport will consider over time the practicalities and realities of trading between the two blocks. Until these institutions are established little progress can be made in listening to the concerns of industry and the development of practical solutions that appeal to all parties.
2. The political will on both sides needs to be evident to assist with the delivery of more efficient trade flows between the two blocks particularly in the area of products of animal and plant origin.

ENVIRONMENTAL / DECARBONISATION

FTAI is actively involved in environmental management within the haulage sector. The FTAI’s TruckSafe™ and VanSafe™ standards focus on how commercial fleet operators are managing the safety of their drivers, the roadworthiness of their commercial fleet and their fuel consumption. The FTAI audit process examines operational compliance in the areas of road safety, haulage operations, roadworthiness, working time and environmental efficiencies. As an operational compliance audit both TruckSafe™ and VanSafe™ are encouraging members to have sustainable and pro-active fuel management policies and systems in place. This has the added benefit for members by helping them reduce their carbon emissions, reduce costs associated with fuel purchasing and aid their transition to alternative fuelling technologies whilst staying safe on the road. Members are required to submit a 3-year fuel efficiency and management plan as part of their annual audit. Data on Litres of fuel used, and Kilometres driven are collected from members of the scheme each quarter.



In line with the Paris accord to limit global warming to 2degC freight must reduce its emissions by at least 80% to 2050 whilst growing its volumes by 230% - ITF - Need to recognise that HGVs are one of the hardest transport modes to decarbonise!



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

In Ireland we have set ourselves a -50% target to 2030 whilst the population is projected to grow by 10% to 2030 and therewith freight volumes, whilst the Department of Transport maps out a 91% increase in Tonne/Km to 2050. Since 2014 FTAI has promoted, and in recent years run, a CO₂ reduction programme in the form of our EEOS funded and SEAI regulated Green Certificate programme. This recognises hauliers for their performance improvement based on primary (measured) data submitted quarterly. The results of the overall programme for the period 2014 to 2020 are summarised below.

- 89,476 tonnes of CO₂ emissions avoided.
- over €750,000 paid out to licenced operators for demonstrating reductions in fuel consumption.
- over €56m savings from avoided fuel use.

Academia can provide a valuable service to industry and the Government in independent verification of the results of the many actions that can be taken, helping policy makers to focus policy and funding as the evidence base grows, but this evidence base must result in real action on the ground and not just be models or papers. Specifically;

- Recognise fuel and energy efficiency / performance-based programmes, such as that run by FTAI, by prioritising participants for scarce renewable resources – there is no point in burning a valuable renewable fuel in an inefficient fleet.
- Relative performance improvement in L/100km is the first step to the absolute emissions reductions required; Litres and Km from primary data sources provide a solid foundation for action and reporting (vs figures derived from financials - whilst all contribute).
- Prioritise the elimination of waste in empty running, narrow delivery windows, and part loading and support planning, software and telematics use across the sector.
- Clearly define what the Government considers to be a clean vehicle now, so the industry has a benchmark against which to improve (e.g. Euro VI with AdBlue as baseline or the Clean Vehicle directive definitions – anything to clarify and bring certainty to this issue).
- Communicate the need for absolute reductions as well as relative performance improvement. Climate legislation makes it clear that absolute reductions are needed in line with science based targets, the industry has the tools the will and means to deliver but clear communication is needed from Government.

Summary of key points for consideration:

With the industry already taking a lead in emissions reduction, Euro VI is clean enough to clean city air of particulate matter, and COVID-19 showing the importance of resilient reliable freight and logistics, FTAI propose the Government's 10-year strategy consider;

- Prioritise CO₂ reduction in Department communications and policy. It is very important to be clear in communications to all concerned if net zero is to be achieved in GHG/CO₂e.
- Shifting freight from vans to cargo ebikes requires prioritisation of parking for mobile warehouses and similar hubs in urban areas. Ensuring freight stays on efficient HGVs as long as possible means building parcel hubs and loading bays along with segregated cycleways.



- Quickly provide guidance to industry in relation to insurance, tax and registration requirements for urban delivery vehicles such as electric tricycles and quadricycles used for final mile delivery.
- Improving performance is every fleet operators' day job but it would be greatly helped by clear communication of long term targets and short term tactics across Government; let us not repeat the delays of CNG in battery or hydrogen electric vehicle upgrades.
- The future is zero emission, cost parity will likely arrive sooner than we think, and the country must be ready with access to the grid and gas network/refuelling infrastructure years in advance, this requires funding, but it also requires regulatory bodies to be in alignment if they will not work in parallel.
- Ecodriving training is a proven solution, as is energy management in the form of ISO50001 or at a lower level FTAI's Green Certificate and EEOS funded programmes; funding would be nice but recognition would be a faster route to delivering measured savings.
- Task academia with reviewing results of industry programmes, not researching solutions already well proven elsewhere; enhance academic output and Government policy.
- Quick actions – no research required:
 - Barrierless tolling for HDVs is implementable now with majority of HDVs tagged and only the toll operators standing in the way.
 - Clear longer dimension rules and routing from the RSA in combination with TII can lead to optimum locations for new warehousing rather than developer led as now.
 - Dedicated parking for mobile warehouses in towns and cities; reduce batch of one losses and facilitate reverse logistics in the circular economy whilst reviving urban centres.
 - Grant HVO an excise holiday to kickstart demand in trucks from whence refinery and fuelling investments can support sustainable aviation fuels in due course.
- Additional research topics for debate
 - With limited rail lines is it better to shift passenger car traffic to rail, or road freight to rail? The answers will be route specific amidst new direct routing to Europe.
 - Where do the opportunities for cross sectoral collaboration lie? Timber and fertiliser is a well known back haulage opportunity where are the others.

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

The commercial transport sector is a multifaceted entity that needs clearer definition for the purpose of pursuing solutions that support a sustainable transition to alternative cleaner fuels. In this context a Multifuel Safety Framework should be considered to provide guidance and information as to the viability and availability of alternative fuels. In addition, impartial analysis of available technologies should be provided to assist operators understand what alternative technologies are available and suitable for their needs.

The commercial transport sector is a multifaceted entity that needs clearer definition for the purpose of pursuing solutions that support a sustainable transition to alternative cleaner fuels.

Commercial fleet operators come in many guises operating across all industries including, haulage, manufacturing, retail, warehouse and distribution, construction, private and public passenger transport operations, security, telecommunications etc. Commercial fleets comprise of Light Goods Vehicles (LGVs), HGVs and Passenger Vehicles. The average fleet size in the haulage sector is 5.5 HGVs per fleet and the biggest commercial fleets are in local authorities or semi-state bodies. Because of the variety of type of commercial fleets, the weights carried and the size of vehicle, distances travelled,



urban versus motorway driving, national versus international driving, consideration must be given to understanding the cost associated with transitioning to newer fuelling technologies, the availability of the technologies, the lifespan of the new technologies and most importantly the infrastructure available to support the effective transition to newer fuelling technologies. It is reasonable to assume that for new technologies to be introduced they must make business sense, be sustainable (in the sense that they are not short-term solutions) and most importantly affordable. The age of a commercial vehicle in Europe could range from 5 years at the lower end with an average of 11.6 years for LGVs, HGVs 13 years and buses 11.7 years¹⁴.

Whilst FTAI recognise and support the move to new fuelling technologies that deliver improved air quality and reduced greenhouse gas emissions, it is important to note that the points outlined do not divert from our position that those that continue to operate diesel commercial vehicles must be supported to ensure they do not face an unfair competitive environment. This could occur due to the increased cost of diesel and the Government policy to increase carbon tax substantially over the coming years. Zero emission isn't possible in the short to medium term, gas can be deployed in the short to medium term and deliver savings.

Assuming less polluting means less CO₂, operational incentives are required e.g., prioritise double length trailer licences for clean and green HGVs, likewise the excess weight derogations for alternatively fuelled HGVs should be communicated to dealers and operators alike. FTAI recommend that the following is considered to incentivise the take up and usage of less polluting HGVs:

Support should be forthcoming for Biomethane production which can deliver sufficient Biogas into the grid. A working group should be established involving key industry stakeholders with representation from the DAFM and Department of Transport to drive forward opportunities to develop more interest in anaerobic digestors.

1. We have long argued for the projected carbon tax increases to be offset via the Diesel Rebate Scheme for EURO VI only, further incentivising newer vehicle uptake in the second-hand market. Any such scheme necessitates accurate and consistent recording of EURO emissions class on the National Vehicle File and will also provide a much-needed input for Government statistical reporting into the future.
2. Impose greater restrictions on imports of older EURO IV / V vehicles through taxation thus incentivising purchase or more efficient vehicles.
3. Incentivise better load management and reduce the requirement for empty running.
4. Education of haulage businesses / supply chain operations in central to success. In any transition to new technology knowledge will play a key role. To remove the fear and anxiety of transition robust education on the solutions available be it electric, gas hydrogen etc will be needed with demonstrable case studies to illustrate how beneficial the change can be.
5. To encourage investment in what are currently more expensive alternatives to diesel the refuelling infrastructure must be available to support the transition. Be it either electric, gas or other alternative fuels real focus is needed on the roll out of fuelling or charging infrastructure to support any transition. COVID-19 played a role in the current delay in roll out of the Compressed Natural Gas (CNG) stations but there are also other departmental and regulatory issues contributing to these delays. A review of the overall process involving all stakeholders with regard to commissioning CNG stations (Gas Networks Ireland (GNI), CRU, Forecourt sector) to understand the bottlenecks and streamline the process into the future is required.

¹⁴ <https://www.acea.be/statistics/article/average-vehicle-age>



6. A pragmatic approach must be taken, realistic transition deadlines must take account of lack of viable alternatives, production and availability of alternative fuelling technology, the cost of the infrastructure and the global availability of the technologies. Currently there are short supplies of batteries, IT chips and there is not enough capacity on the electrical network to support mass transition to electric vehicles.
7. We have seen a large uptake in alternatively fuelled vehicles with the introduction of both the Government and GNI grants to support transition. This needs to be maintained for the next few years to encourage a large sector take up which will support the business case for further fuelling forecourts, charging points etc. Extend the criteria for qualification for grants based on the net tonnage of CO2 savings of the new alternative fuelled vehicle.
8. Diesel is the workhorse fuel for vehicles over 3.5t. Whilst there are a number of options available to improve emissions, including Euro VI engines, there is no one easily identifiable short to medium term solution for transition. This is due to a number of factors including, use of vehicles, where there are constraints for international hauliers because of limitations on acceptability of Liquefied Natural Gas (LNG)/CNG on ferries and the Channel Tunnel.
9. There is a need to develop a culture of understanding the benefits of reducing the carbon footprint. FTAI's TruckSafe™ Green Standard that requires an annual audit of Eco-driver training, improved vehicle efficiencies and integration of alternative technologies into the fleet, should be recognised as developing a culture of compliance and management of fuel.
10. The excise duty for HVO fuels should be such as to operate as an incentive to their use.

CNG fuelled vehicles save approximately 28 tonnes of CO₂eq per vehicle each year. As this fuel is available it should be actively promoted and supported publicly as a viable alternative during transition, and as a viable solution for operators as they plan for net zero emissions. For every 100 CNG HGVs, emission savings can be 2,737 tonnes CO₂eq per annum which is a substantial improvement and can deliver immediate benefits. However, if CNG HGVs are refuelled with Biomethane, it would see a reduction of 152 tonnes of CO₂eq each year. For every 100 CNG HGVs fuelled with Biomethane savings will be 15,111 tonnes of CO₂eq per annum.

FTAI recommends:

1. An additional discount on GNI connection fees should be provided for CNG Station developments.
2. The GNI monthly gas invoice incorporates transportation fees of circa 16%. This fee should be cut by 50%. A fee reduction of this scale or more would facilitate station development. Infrastructure (private and public) is urgently required for CNG. GNI has taken the lead however their price point and timelines are not effective, with only one station opened in Ireland during 2020 and none to date this year.
3. Biogas incentives should look to aligning the price of Green Gas to be no higher than diesel.
4. Biogas should have the same status as electricity as an alternative clean fuel that delivers zero emissions.
5. CNG Stations should be considered critical infrastructure and all planning applications sent directly to An Bord Pleanála.

Grid connections

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

FTAI is already hearing from SME members of issues for van depots accessing grid connections. It seems very unfair that datacentres with much fewer employees seem to enjoy priority access whilst



SMEs do not. Whilst these issues are always complicated and very much site specific, we do think that a transparent and open methodology is needed to prioritise decarbonisation of existing transport services over new demand for connections to both the gas and electricity grids.

Given the Minister of transport also has responsibility for the Department of the Environment, Climate and Communication and the Department of Transport, the Minister is in a strong position to ensure that decarbonisation can be counted in prioritising transport sites for grid upgrades or connections. For example, a single Heavy-Duty Vehicle (HDV) can consume 35-50,000L per annum each or for 10 a total of 3.5-5GWh of energy, emitting 110-159tonnes CO₂e (at 3.17kg CO₂e/L WTW); switching 1 HDV to battery electric at 296gCO₂e/kWh (SEAI 2020 Energy Balance) would save 60% in final energy increasing cost competitiveness and reducing emissions by 69-98t CO₂e per annum with at least a 10-year life to the connection and possibly 20 years plus.

Prioritise HDVs for Grid access	Factor	Avg	FTA Members	
HDV		35,000	50,000	Litres
kWh	10.17	355,915	508,450	kWh
CO ₂ e WTW (GLEC)	3.17	110,950	158,500	kg CO ₂ e
		111	159	tonne CO ₂ e
60% saving based on experience to date with Vans and 69% saving in DTTAS Bus Emissions Trials				
Battery Electric HDV (consumption)	40%	142,366	203,380	kWh
Battery Electric HDV (emissions)	296gCO ₂ e/kWh	42	60	tonne CO ₂ e
Saving		69	98	Avoided t CO₂e
<i>Saving over 10 year life of connection</i>		<i>688.10</i>	<i>983.00</i>	<i>Avoided t CO₂e</i>

What is needed to incentivise less polluting Light Commercial Vehicles?

The FTAI is, through its TruckSafe™ & VanSafe™ standards, encourages members to have sustainable and pro-active fuel management policies and systems in place for their commercial fleet operation. These programmes aid operators consider transition to alternative fuelling technologies whilst at the same time prioritising staying safe on the road. The changeover to alternative fuels within the haulage sector is happening at a much faster pace when it comes to LCVs in comparison to HGVs, with LCVs predisposed to transition to electric vehicles due to a growing number of options on the market, and with a particular benefit that newer model LCVs have increased range. It is recommended:

1. Further toll charge reductions should be provided as an incentive to transition to an electric LCV.
2. Funding needs to be provided to suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure.
3. With a high proportion of LCVs taken home by drivers after their days work, home chargers should be included for funding those operating company electric vehicles.
4. Grants should be available for commercial chargers for leased vans and not limited to owned vehicles.
5. The Price of alternatives need to be comparable to diesel.
6. Infrastructural development is essential to increase the availability and accessibility of places to fuel/recharge.
7. Commercial SEAI grants for LCVs should at the very least match private vehicle grants.
8. Clarity should be provided on how the electricity that is used to recharge vehicles is produced (e.g. how much is from a renewable source)



9. At the point of purchase, more details and guidance should be provided on how and where batteries are sourced, how they are manufactured and disposed of, including the cost of disposal. Clear guidelines including cradle to grave lifespan of the battery should be provided to create more trust and confidence that the technology is truly better for the

Infrastructural development is essential to increase the availability and accessibility of places to fuel/recharge.

environment.

When businesses are considering changes to their own operations in terms of environmental impact, it is important that all facets of their business mirror this strategy. Procurement practices must change to match the environmental policy of the business putting alternative fuels, fuel management programmes and other key indicators to the fore of the decision-making process for tenders. Checking that companies are not paying lip service to environmentally friendly practices must be introduced to protect the integrity of schemes introduced to promote environmentally friendly practices. State agencies, like all private sector organisations, that use, or contract commercial vehicles need to change procurement practices to take account of services that are transitioning to alternative fuels and or use the most modern Euro VI engines and have (documented) fuel management plans in place. Upon winning contracts independent operator compliance auditing should be introduced to ensure that all contractors are adhering to the service levels they promised during the tender process.

In addition to the information already contained in this section consideration must also be given to the implications of increased taxes on fuels essential for the haulage sector.

From 1 May 2021 the carbon charge on certain mineral oils and vehicle gas increased from €26 to €33.50 per tonne of CO₂ emitted.

The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 50% of the HGV and Bus national fleet. Extension of the low excise rate of €2.60 per GJ on natural gas as a vehicle fuel would also allow for delays to infrastructure provision as well as taking account of vehicle purchase decision cycles.

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In order to ensure that the freight and logistics sector in Ireland can continue to trade cost-effectively in a post-Brexit environment, it is important that the Government does not increase diesel fuel duty for commercial vehicles. Currently, the rate of excise charged on petrol is 58.7 cent per litre, including a 4.6 cent carbon charge. The corresponding rates for diesel are 47.9 cent, with a 5.3 cent carbon charge. Fuel Equalisation is being touted as the solution to air pollution for the private motorist reliant on diesel fuelled cars.

Fuel costs now represent a third of the total cost of the operation of an articulated lorry. Additional increases in fuel costs would need to be passed on to customers, which could mean the death knell for new trading partnerships and a severe restriction on potential trading expansion for shippers, at a time when they need as much support and stimulus for trade as possible.



Rather than increasing fuel tax across the board on the logistics sector, FTAI recommends the Government incentivise the industry to run its vehicles in the most fuel efficient and environmentally friendly way. The freight industry is under continued pressure from legislators, consumers, and society to improve efficiency and reduce carbon emissions. With existing support from Enprova and SEAI, essential users can improve their fuel performance and thus reduce their emissions. The big benefit of improved fuel performance is firstly to the operators' bottom line as profit. Through a CO₂ tax discount based on improved performance, a strong signal can be sent to operators that fuel performance also matters when it comes to improved air quality. Gathering such performance data offers the opportunity to underpin future Government Policy with hard data from the industry itself, on elements such as vehicle choices. Developing a culture where the operator is developing a culture of fuel efficiency will automatically translate to future adaption by the industry of alternative fuel technologies. Support and incentives must be provided to industry to this end. In addition, there should be tax breaks for CNG / LNG and electric vehicle adaption.

Should eco-driver training be rolled out further, for example, as part of Driver CPC training?

Eco-driver training is viewed by FTAI as a critical factor in reducing CO₂ emissions and is promoted by the FTAI through its TruckSafe™ and VanSafe™ standards. However, Eco-driving needs to be defined, understood and implemented in a manner that delivers results.

Eco-driver training is viewed by FTAI as a critical factor in reducing CO₂ emissions and is promoted by the FTAI through its TruckSafe™ and VanSafe™ standards. However, Eco-driving needs to be defined, understood and implemented in a manner that delivers results, with a blended approach taken to eco-driving that includes in-cab training and classroom modules. Definitions and standards, reflected in reporting requirements would be more effective in what is already a competitive market. In addition, the Transport Manager CPC programme should be overhauled to reflect the technology and tools that future drivers and transport managers will be dealing with in the next 10-20 years.

Reducing fuel consumption positively impacts the environment and provides extensive improvements to the logistics operation. Business costs are lowered through savings on fuel purchasing and reductions in vehicle maintenance. Other benefits include improved road safety for both the professional driver and other road users. The provision of Eco-driver training should not only be encouraged through the driver CPC module but also supported through the development of a code of practice for safe fleet operations, to include guidance regarding risk assessments and training for drivers similar to the driving for work programme¹⁵.

Linking the necessity for training with the benefits of the training must be supported by consistent messaging by all stakeholders. As an example, employers have a responsibility under health and safety legislation to carry out risk assessments and implement control measures to reduce or remove risk. Driving is the highest risk activity for professional drivers and as such needs to be supported by appropriate training, with Eco-driver training being part of this training and acting as a control measure to manage this risk, while at the same time benefitting the environment.

¹⁵ <http://drivingforwork.ie/employer-resources/>



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

Local authorities for Ireland's main urban centres need to review their freight distribution movement plans and develop a more freight friendly strategy that takes account of the environment, traffic congestion, local residents, vulnerable road users and the distributors themselves. The focus should not be on new solutions for distribution but on development of solutions that can maximise the efficiencies for operators trying to access our urban settings. There are different solutions for different sectors of industry, some of whom already do a high degree of consolidation as it is the basis of their business.

There are different solutions for different sectors of industry, some of whom already do a high degree of consolidation as it is the basis of their business.

The basic premise of this approach is the more efficient they are the better from a cost perspective and service efficiency. Within the express delivery industry specifically customers pay for an end-to-end delivery. This is often with a timed delivery guarantee. Consolidation centers then disrupt this relationship.

In terms of consolidation within the express parcel sector the following key issues should be considered:

- Consolidation could actually drive inefficiencies through additional journeys, double handling of packages, vehicles dropping off volume and then traveling back empty leading to increased empty running.
- From a GDPR perspective, any sharing of (personal) customer data presents legal challenges and increases risk.
- Every element of the supply chain is critical, however the final mile (where the item leaves the consolidation center on the final leg of its delivery journey to the customer) is where the greatest impact can be made in terms of the customer experience, so who would be responsible, and pay, for the final mile?
- Who would deal with the customer service issue on the final mile in case of loss, damage, delayed deliveries?

Micro consolidation sites within city centers do have value and should be explored. This offers the opportunity to deliver to designated hubs with perhaps double trailers where one is dropped in one location and one in another. The trailers are switched regularly and have goods for onward delivery reducing the amount of empty running. Both centers could be served by e-cycles / e-vans for both distribution and collection.

Other sectors may also consider consolidation centers as an opportunity to deliver efficiencies that reduce empty running and maximize efficiencies, particularly in the case of smaller businesses.



How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.

In the medium term, if not beyond, the national and international haulage sector and those in the freight distribution and logistics sector will be adversely affected by the climate policy in Ireland. The timeframe is dependent on the availability of net zero fuelling technologies and the infrastructure necessary to sustain them. As the infrastructure is developed to support alternative fuels the industry will remain reliant on diesel. Whilst there will be increasing numbers transitioning to alternative vehicles such as CNG/LNG/Electric, and to a limited degree hydrogen, the vast majority will continue to operate diesel vehicles. To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered businesses who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies.

To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered businesses who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies.

The following issues must also be considered when promoting efficiencies within the haulage sector:

- A key challenge faced with an expanding electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. It is not feasible to charge the vehicles during the day as they are on the streets carrying out multiple deliveries with only minimum time spent at each location. Grid upgrades can be extremely costly and when combined with the cost of an EV, this can be prohibitive for some companies.
- Allow more efficient delivery opportunities outside peak hours. HGVs are getting quieter every year with “silent” electric HGVs due from 2025. This needs to be considered when planning / revising urban delivery rules.
- Make narrow delivery time windows wider to allow HGVs to cope with the unusual traffic patterns to come. Make this change permanent to save emissions (Prof. Alan McKinnon et al).
- Incentivise the move to alternative fuelling technologies for HGVs. Support CNG / LNG, biogas; electric and other progressive cleaner fuelling options such as hydrogen. Grant increased access to city centre and city deliveries through a registration scheme. Reduce future Low Emission Zone (LEZ) permit fees for those fleets with accreditation for safety and environmental management e.g., FTAI VanSafe™ and TruckSafe™.
- Barrier free tolling - Allow all HDVs to use barrier free tolling lanes at toll booths. The lanes already exist, the technology is in place and the tags are already on most vehicles.
- Improving performance of existing vehicles and supply chains
 - Improving vehicle performance in L/100km and L/Tonne/Km directly reduces CO2 emissions and improves air quality. FTAI Managers Guide to Distribution Costs 2019 (2020 survey ongoing) shows average fuel consumption is 25/100KM with the average daily distance being travelled by HDVs being 328.5km. 72% of respondents monitor fuel consumption for their commercial fleet.
- Capital support to de-risk service station supply of alternative fuels for electric / CNG / LNG etc.
- Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed and implement now to stop imports of “dirty” Euro I-V commercial vehicles.



- Incentivise purchase of Euro VI and CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs. HGVs bought today will be on the fleet for next 4-5 years and on-road for 10-12 years.
- The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet.
- It costs over €1 million to install a fast fill CNG filling station in a private operator's yard. Due to current regulation the private 'early adaptor' cannot sell on the CNG. The cost of installation makes the transition to CNG prohibitive. Many larger HGV fleet operators buy their diesel fuel in bulk and supplement their onsite refuelling with access to the forecourt network through fuel cards. This is not currently possible for CNG. The causeway project¹⁶ aimed to deliver 14 publicly available refuelling sites by the end of 2020. Currently there are 3 (as of July 2021) in Ireland dispensing CNG. To support the commercial fleet operator, the transition to alternative fuels that work for them and are better for the environment, the Government must have appropriate mechanisms in place at a national and local level to remove barriers to adoption.
- Develop clear safety guidelines to support the transition to alternative fuelling technologies.
 - Enforce higher standards and stop low quality entrants in the sector. Specify Euro VI / CNG / LNG minimum for all future Government grants and funding programmes thus reducing operator uncertainty and helping accelerate investment. This would immediately slow imports of used Euro I-V HCVs.
 - Last mile delivery - Support cargo bikes. Congestion charges in urban areas
 - Smart Motorways – betting traffic Management, particularly in Urban centres
 - Encourage holistic approach to carbon transition by providing necessary education and training to develop competencies.
 - Link with the transition to low carbon operations with improved efficiencies and overall business savings through more efficient operations – Support the cultural shift by encouraging more Eco-driver training.
 - Support Biomethane production in Ireland.
 - Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer.
 - Support initiatives like FTAI's TruckSafe™ and TruckSafe™ Green Standard / VanSafe™ by reference them as examples that deliver in terms of better fuel efficiency, improved environmental performance particularly the TruckSafe™ Green Standard
 - TruckSafe™ and VanSafe™ support the transition to better environmental management by:
 - Education and awareness of good environmental practices
 - Supporting cultural shift
 - Creating awareness of fuel efficient and good environmental practices that deliver operational efficiencies.
 - Recognising best practices
 - Supports efficient business practices – environmental practices are part of management strategy.
 - State agencies charged with enforcement at our ports must engineer solutions (and have appropriate resources) to limit delays for hauliers. All unnecessary queuing of trucks adds increased emissions reducing the air quality in our port environments.
 - Good Traffic Management plans to reduce traffic congestion will improve air quality particularly at our ports and on the M50
 - Review traffic plans regularly and all stakeholders must work collaboratively in the Port areas to deliver effective and efficient traffic management.

¹⁶ <https://www.gasnetworks.ie/business/natural-gas-in-transport/the-causeway-project/>



- Education campaigns to educate non-HGV drivers of the appropriate lane to use and lane discipline on motorways and dual carriage ways.
 - The adoption of penalty points/sanctions for those drivers not adhering to proper lane discipline should be considered.
- Sufficient infrastructure must be provided at ports to support the services that are provided. The increase volumes of unaccompanied trailers shipping between Ireland and GB and continental Europe dictate that increased parking areas for the trailers need to be provided.
- Prioritise and encourage double length trailer usage. The permit requirements for longer combinations must be reviewed to support a more flexible process that encourages operators to consider longer vehicles.
- HVO – Hydrotreated Vegetable Oil
 - A Sustainable Aviation Fuel (SAF) is needed as 35% of Ireland’s exports by value go by air.
 - When made from wastes and green hydrogen, HVO can deliver 80+% CO₂e/GHG reductions and cleaner exhaust emissions from existing diesel and aero engines. As an island with a need to decarbonise HGVs for exports surely there is a case for supporting for HVO?
 - The fuel supply industry is waiting on Government, excise can be waived to accelerate demand in the forthcoming 2022 budget for this bridge fuel to electric.

ROAD SAFETY

Driving for a living is a high-risk occupation with the likelihood of being involved in a road traffic incident 40%¹⁷ higher than it is for other road users. Understanding rules of the road and adhering to the road safety rules in the jurisdiction you are driving in is a basic requirement for all professional drivers. Since its inception in 2006, the RSA, through effective media campaigns, has been successful in bringing to the fore the importance of road safety. For commercial fleet operators there is a myriad of legislation and guidelines that must be observed such as speed limits, weight limits, roadworthiness of vehicles, working time and tachograph regulations, intoxicated driving, safety, health and welfare of drivers, operator licencing and rules for international transport. The employer must ensure that their employees meet their legal obligations for the safe operation of their vehicles, and drivers must understand and respect road safety obligations which impact not only themselves but other road users, as well as the need to safely secure and protect their loads.

Between 2003 and 2012, almost half of the 573 reported deaths arising from workplace accidents were vehicle related¹⁸. The workplace for haulage drivers is the cab of their HGV. Creating more awareness around the implications of poor driving behaviour for the safety of the driver and other road users is one of the main areas that should be focused on within this section of the strategy. Linking health and safety and road safety with good clear guidance and information specifically for the haulage sector will go some way to supporting improved road safety. The freight distribution and logistics sector have made a significant impact on improved road safety standard through pro-active training, investment in new safer technologies and adherence to rules and regulations.

We make the following recommendations to support compliant operators:

¹⁷ <http://drivingforwork.ie/employer-resources/>

¹⁸ https://www.hsa.ie/eng/Vehicles_at_Work/Work_Related_Vehicle_Safety/Work_Related_Vehicle_Statistics/



1. The haulage sector operates on very tight margins and is intensely competitive. To ensure all operators are adhering to the rules around working time, tachograph requirements and roadworthiness for example, there must be effective enforcement. For effective enforcement, the authorities charged with regulating the industry must be sufficiently resourced.
 - a. In the instance of enforcing tachograph and roadworthiness rules, the RSA is the competent authority but only has 16 Transport Officers/Vehicle Inspectors. Their powers are limited in that they must be accompanied by a member of An Garda Síochána at road side checks, therefore they need to be well planned and organised which offers limited flexibility. Unlike some other jurisdictions there are no powers to immobilise vehicles where there are issues with cabotage, roadworthiness or tachograph.
 - b. As the EU Mobility package is being introduced on a phased basis, with new requirements for posting of workers, cabotage, and operator licencing for van operators a review must take place in Ireland of the powers afforded to the RSA inspectors.

To ensure all operators are adhering to the rules around working time, tachograph requirements and roadworthiness for example, there must be effective enforcement. For effective enforcement, the authorities charged with regulating the industry must be sufficiently resourced.

2. As mentioned earlier in this document under the heading of Operator Licensing, having a body that is responsible for the sector (Traffic Commissioner) would assist in creating a more dynamic approach to effective enforcement, a greater understanding of the rules around compliance, and the development of effective outreach programmes for mutual benefit.
3. The inadequate number of RSA Transport Officers/Vehicle Inspectors is exploited by non-compliant operators which in turn has the impact of creating an uncompetitive environment for the businesses that place an emphasis on compliance and invest in the training and education of their drivers. This in turn has the further consequence of creating a 'black market' that thrives on beating the system whilst at the same time making the sector unappealing to new entrants.
4. The current driver shortage in Ireland is not unique, it is a familiar sight across the UK and the EU. Protecting workers rights, having a level playing field with reasonable rules and fair and effective enforcement are all necessary to ensure the sector is healthy and safe. This is critical in delivering a future for the haulage sector (for whom Ireland will remain reliant to deliver goods) that thrives into the future.
5. CVRT for Trailers – Electronic certs should be issued for all trailers that pass an annual roadworthiness test. Given the advancement in enforcement technologies a digital certificate would support compliance within the industry.
6. Enforcement technologies – technological advancements should be exploited to support compliance and more effective and efficient enforcement through the deployment of the necessary systems to ensure the authorities are keeping pace with change.
7. Licences – support the deployment of one licence that can include data for Tachographs, Driver CPC card: ADR cards, Driving licence information [Smart cards]

What are the road safety priorities in road haulage for the next 10 years?

1. Adopt the Driver CPC training programme to allow CPD (Continuing Professional Development) that would recognise specialised training to qualify for CPD points or credits on CPC modules. This could be in the areas of on road driver (Eco-driver) training, safe and secure loading training, tachograph training etc.



2. As technology advances and new fuelling technologies are introduced such as CNG, LNG, Electric and Hydrogen new road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies.
3. Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations, through the establishment of a road safety industry working group.
4. Fair and effective enforcement is critical to compliance, with the deterrent effect of law enforcement directly related to the perceived certainty of detection and punishment. Prosecutions for tachograph and roadworthiness offences are rare. More effective enforcement through the use of Graduated Fixed Penalties should be introduced and utilised as appropriate by Transport Officers/Vehicle Inspectors and An Garda Síochána, as more effective enforcement would increase compliance with roadworthiness of vehicles and tachograph and working time regulations.
5. Cabotage and Operator Licencing Offences: prosecutions take a long time and resources to be dealt with in court. The Road Safety Authority have had some success in the Courts against non-State operators¹⁹, it would be much more preferable that both the RSA and the Gardai would have a capability to stop an operator from proceeding with a journey in circumstances that there is clear evidence of breaches of the cabotage and operator licencing rules. Enhanced powers to deal with the alleged offence at the time of the detection is essential to combat effectively those engaged in illegal cabotage and unlicensed haulage.
6. The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. Responsibility to reach the required levels of enforcement to achieve this falls to both the RSA and An Garda Síochána. Relevant training, equipment and allocation of RSA and Garda resources is a prerequisite.
7. Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues, as well as the results from premises inspections.
8. Carry out media campaigns on the correct use of lighting for vehicles to include flashing amber light usage, lighting for abnormal loads, blue lights, doctors, fog lights etc. Provide clear guidance to ensure the safe use of lights and create awareness as to what the different safety lighting is for.
9. The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes.
10. Milk collection operations should come in under the tachograph regulations as this service is predominately carried out by the licenced haulage sector. If it becomes part of the tachograph requirements it removes significant uncertainty around 'in scope' and 'out of scope' driving.
11. Develop more focused promotional activities on topics of importance to the haulage sector such as medical fitness, the importance of good eating habits and the links with improved road safety.
12. Work with industry to create awareness of the risks associate with driving a HGV should be prioritised with a focus on those that contract these services and to include issues such as;
 - a. Driver Behaviour and what influences poor behaviour.
 - i. Lack of understanding of reasons for delays.
 - ii. Unnecessary delays with no explanation

¹⁹ <https://www.donegallive.ie/news/news/645821/hefty-fine-for-northern-ireland-company-caught-breaching-eu-regulations-in-donegal.html>



- iii. Poor welfare facilities for drivers at delivery destinations.
- b. Working time / Tachograph rules for drivers
 - i. Impact of delays on the road
 - ii. Impact of delays at delivery sites
- c. Importance of good communication with drivers
- d. Importance of good communication between the employer and drivers

Fair and effective enforcement is critical to compliance, with the deterrent effect of law enforcement directly related to the perceived certainty of detection and punishment. Prosecutions for tachograph and roadworthiness offences are rare. More effective enforcement through the use of Graduated Fixed Penalties should be introduced and utilised as appropriate by Transport Officers/Vehicle Inspectors and An Garda Síochána, as more effective enforcement would increase compliance with roadworthiness of vehicles and tachograph and working time regulations.

How are these priorities best addressed?

1. Industry engagement should involve representative trade associations, relevant Government departments, the RSA, and the HSA. Clear terms of reference should be developed, and annual priorities and actions agreed to improve road safety. An annual report on progress should be published.
2. Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change.
3. Specific actions should be developed with clear allocation of responsibility. As mentioned, active engagement with stakeholders should be encouraged. For each point, stakeholders must be identified and approached to work collaboratively towards achieving the desired outcome.
4. A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy.
5. Necessary provision of resources for the RSA to recruit additional Transport Officers/Vehicle Inspectors.
6. Necessary provision of resources for An Garda Síochána to increase the numbers in the Garda Roads Policing with commercial vehicle expertise.

What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

- Regular engagement with stakeholders that are willing to work collaboratively with the RSA, inclusive of not just the haulage but also the own account sector.
- RSA to appoint a member of staff with the sole responsibility for liaison with the freight distribution and haulage sector.
- The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets. (A lot of work was done in the early days in relation to the rollout of CVORI

Regular engagement with stakeholder that are willing to work with the RSA, inclusive of not just the haulage but also the own account sector.



and to highlight its importance, however, an absence of ongoing communication has resulted in an understanding of the relevance to industry being diminished.)

What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

All operators, irrespective of size, are bound to operate under the same rules and regulations. Small operations have the same obligations to safety as larger businesses. However, the rules at both national and European level are both numerous and subject to regular change (e.g. Mobility Package), making it is increasing difficult for all operators, as well as enforcement authorities, to keep up to date with the requirements. As a trade association for the sector, FTAI publish member briefing notes to keep members up to date with their requirements. When businesses adapt and adhere to the changed requirements and other don't, an uncompetitive environment is created. More must be done by the State to ensure fair enforcement and to support all business, both large and small, that invest in compliance.

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- Road traffic, and other legislation relevant to the haulage sector, is extremely difficult to follow because of its complexity and the fact that it is fragmented as a consequence of numerous amendments.
 - The legislation should be consolidated with a view to ensuring:
 - It is relevant for the times we live in.
 - The language used is more easily understood.
 - It is segmented in a structured and organised manner making it easier to follow.
 - Legal obligations are easily identifiable and the legal consequences for non-compliance are clearly set out.
- The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns covering such topics as:
 - Speed compliance.
 - Intoxicated driving.
 - Distracted driving.
 - Fatigue and taking of rest periods.
 - Safety at service stations.
 - Medical fitness to drive and the importance of healthy eating habits.
 - Safe and secure loading.

Do you have any other comments on road safety matters?

- The Government should establish a new Office of Traffic Commissioner to drive reform and work with relevant stakeholders, including Government departments, An Garda Síochána, the RSA and HSA, for the purpose of ensuring, amongst other things, only competent and reputable people operate within the haulage sector and a more collaborative approach is taken to non-compliant operators.
- Graduated Fixed Penalties – enable enforcement authorities to issue on the spot fines for infringements in tachograph / minor roadworthiness offences, thus reducing the time spent



by enforcement authorities in court as well as the burden on the court system so it can deal with more serious issues, while at the same time serving to encourage more compliance on the minor issues.

- More safe and secure rest areas on national routes.

MOBILITY PACKAGE

What are your views on how Ireland implements the Mobility Package changes?

The Mobility Package contains significant changes that have far reaching implications for the freight distribution and logistics sector as well as for the authorities assigned with responsibility for enforcement of the package requirements. The Mobility Package introduces new mandatory operator licensing requirements, but it also introduces optional requirements that Member State may decide to impose.

Like all regulations and legal obligations, it is up to operators to understand the legal requirements to carry out their commercial duties in a safe and legal manner. It is up to the enforcement authorities to carry out enforcement in a fair, proportionate and consistent manner. The issues contained in the Mobility Package such as the changing requirements for posting of workers; cabotage changes; changes to working time; and return of the vehicle and operator licencing for international van operations, will create a set of minimum standards that need to be met and adhered to, which are designed to improve working conditions and safety for drivers. To protect fair competition of international transport, the authorities must be resourced sufficiently to carry out effective and consistent enforcement. The following must be considered:

- Mobility Package implementation will rest with different Government departments. Given that there are significant new requirements for the operation of commercial transport in Europe, this is another example to support the establishment of a 'body' with overarching responsibility for commercial transport operations.

Mobility Package implementation will rest with different Government departments. Given that there are significant new requirements for the operation of commercial transport in Europe, this is another example to support the establishment of a 'body' with overarching responsibility for commercial transport operations.

- Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant.
- Discretion is allowable for the implantation of elements of the Mobility Package. It is important that authorities in Ireland do not create an unfair environment for Irish business by not implementing elements of the Package that are rigorously enforced in other Member States.
- The Department of Transport is currently responsible for operator licencing in Ireland. Will Van licencing sit in this Department?
- Operator licencing will be newly applied to vehicles with a maximum permissible mass exceeding 2.5t and up to 3.5t which are engaged in international transport operations. It should only be applicable for journeys undertaken for hire and reward and exclude own account operations.



What are your views on the return of the truck?

Regulation 1071/2009 as revised by the Mobility Package creates a new obligation in relation to operator licensing:

“An undertaking shall organise its vehicle fleet’s activity in such a way as to ensure that vehicles at the disposal of the undertaking and used in international carriage return to one of the operational centres in that Member State at least within eight weeks after leaving it.”

This provision is aimed at addressing unfair competition concerns on the part of Member States whose geographical situation makes them prone to competition from countries with lower labour costs. FTAI believes this new provision is laudable but raises the following challenges to its implementation:

- The concerns of Member States are partially addressed by the minimum wage schemes in place in several countries. Irish hauliers carrying out international transport are therefore subject to these administrative requirements, which do create red tape, even if Irish salary levels don’t risk undermining competitors on the basis of labour costs. FTAI therefore warns against multiple layers of requirements to address the same concern as this makes compliance and enforcement unnecessarily more complex.
- While many Irish companies already operate on a model where the HGV returns to Ireland at least every eight weeks, the provision creates unintended consequences for specialist hauliers. An example of this are companies which move equipment on concert tours across Europe, some of which can last longer than eight weeks, and provide an end-to-end service to touring artists and their crews. This is a key customer requirement and is essential to service quality in this very specific market segment where the route, schedule and logistics are dictated by venue availability. While this segment of the market is relatively modest in size at present, the consequences of Brexit (and reduced EU market access rights for UK-based touring companies which currently represent 85% of the touring market) are bringing new opportunities for Ireland. There is some evidence of UK companies considering relocation to Ireland. As Ireland attracts more of these companies, the return of the vehicle issue will become a more sizeable one, albeit EU legislators were only ever targeting a totally different part of the market.

While many Irish companies already operate on a model where the HGV returns to Ireland at least every eight weeks, the provision creates unintended consequences for specialist hauliers. An example of this are companies which move equipment on concert tours across Europe, some of which can last longer than eight weeks, and provide an end-to-end service to touring artists and their crews.

- In market segments that aren’t operating an eight week return pattern yet, the requirement will increase unnecessary empty runs, with detrimental economic and environmental consequences. The European Commission’s impact assessment itself estimates that *“the provision is likely to create additional journeys, potentially resulting in up to 2.9 million tonnes of additional CO₂ emissions in 2023 (a 4.6% increase in international road freight emissions). Across the three scenarios that were studied, the increase in CO₂ emissions ranges from 0.8% to 4.6%.”*
- Ireland being an island State, FTAI seeks consideration for compensation for the increased costs of connectivity with continental Europe and or a derogation seeking an exemption from the requirement to return to Ireland within 8 weeks.



ROAD INFRASTRUCTURE

Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

Quality of service and rest areas for commercial travellers have improved in Ireland particularly linked with the investment in the road network. As a starting point consideration must be given to our key strategic ports and the facilities available to drivers. Ireland needs to ensure that it is on par with the requirements to adhere to the Mobility Package requirements for safe and secure parking for commercial drivers. The European Access Point for Truck Parking Data will enable continuity of services throughout the EU. This system aims to provide access to safe and secure HGV parking data in DATEX II format. At this moment, the Access Point only supports static data²⁰. The responsibility for data quality and the necessary updating/maintenance obligations remains with the Member States that are submitting the data to the Access Point. It is important that Ireland participates on this programme as we are reliant for the movement of goods by international hauliers and their drivers. Creating a connection with this information will help planning of rest periods and support the welfare of drivers.

The EU commission is looking to develop consistent guidance for Member States on safe and secure parking facilities. TII has implemented plans to have on-line service areas on motorways and high-quality dual carriageways, on average, every 60km.

From the perspective of the haulage sector, facilities must include the following:

- Areas for commercial vehicles to park safely and securely, allowing drivers take their mandatory break and rest periods (including overnight parking).
- Refuelling facilities catering for all fuel types and electric charging.
- Suitable toilet and shower facilities. (Maintained and regularly cleaned to the highest standards. Currently many are filthy and in a poorly maintained state - broken doors, toilet seats etc.)
- Comfortable social rest areas.
- 24/7 availability of healthy food options.

As alluded to throughout this submission, fair, proportionate and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture that recognises the legislation and the regulations as underpinning a fair, competitive safer environment for all. On-line service areas should therefore also incorporate facilitates that allow all agencies charged with monitoring compliance with all aspects of legislation relevant to the haulage sector, carry out compliance checks and appropriate enforcement, including immobilisation of vehicles should this be provided for into the future.

What more is needed in relation to road user charging for freight transport in Ireland?

- Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport.
- The change in the emphasis on road user charging at EU level [*Directive 1999/62/EC provides the legal framework for charging HGVs for the use of certain roads. The directive aims to eliminate distortions of competition between transport undertakings by a step-wise harmonisation of vehicle taxes and the establishment of fair mechanisms for infrastructure*

²⁰ https://ec.europa.eu/transport/themes/its/road/action_plan/intelligent-truck-parking_en



charging] 'to make the polluter and user pay is difficult to argue against, especially as the proposal now relates to HDVs and the inclusion of cars and vans, not just HGVs as has been the focus in the past. However, the extent to which the polluter/user pays principle will be taken up by politicians is debatable as there has always been a fear of upsetting car owners.

- A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. FTAI would like to see the money collected to provide better infrastructure within certain constraints. This investment could be put into better service facilities for drivers and improved road enforcement facilities for the Gardaí and RSA Transport Officers/Vehicle Inspectors. The safety of all road users is paramount including the safety of the authorities charged with ensuring road user compliance.
- Advances in engine technology, led by changes to HGV engines reducing particulates and the better performance of Euro 6 on NOx should result in reduced road charging rates. Users of Alternative fuels (to petrol/Diesel) should benefit from reduced road charging rates. This could form the basis of additional incentives to encourage operators to move to cleaner fuelling technologies sooner.
- The current reduction in Toll rates for users of 'Alternative Fuels' should continue.

LABOUR MARKET SKILLS

The freight distribution and logistics industry is a vibrant and vital sector for the economy of Ireland, contributing in excess of €1billion a year to the exchequer in the form of PAYE, PRSI and road taxes. The transport sector in particular has been less successful than others in recruiting younger workers. There are many reasons for this, including a perception that it is made up of predominantly low skilled jobs, working hours are long, unsociable, and unpredictable, and there isn't an obvious career path. This perception must change. Unfortunately, because of this perception the transport and logistics sector is suffering from a serious skills shortage across all levels which hinders progress and makes dealing with change within the transport and logistics sector extremely difficult. We need to question why there is a skills shortage in the first place.

The labour needs of the freight, transport, distribution and logistics sector are developing as forecast in the 2015 EGFSN report²¹. At the time of 2016 Census there were 49,470 people working in this field. In the absence of a major external shock the labour needs of the sector are expected to increase to 66,204 by 2025²². Given the age profile of people working in the sector, approximately 13,752 of those currently working in the sector are expected to retire by 2025. In summary, a total of 30,486 individuals will have to decide to take up careers in the sector and receive all the necessary training between now and 2025 in this baseline scenario.

Table below is page 103 of the report <http://www.skillsireland.ie/Publications/2015/18022015-Freight-Skills-Publication-pdf.pdf>

²¹ <http://www.skillsireland.ie/Publications/2015/18022015-Freight-Skills-Publication-pdf.pdf>

²² <https://dbei.gov.ie/en/Publications/Publication-files/Skills-needs-potential-trade-implications-Brexit.pdf>



Table 7.9: Baseline employment, forecast demand and shortfall by core FTDL occupations

	2011	2020 Demand		Shortfall 2020	
	Baseline	Recovery Scenario	Delayed Scenario	Recovery Scenario	Delayed Scenario
HGV drivers	19,758	25,201	23,920	8,406	7,125
Mobile machine drivers & operatives n.e.c.	5,426	6,921	6,569	2,230	1,879
Managers & directors in storage & warehousing	4,071	5,193	4,929	1,430	1,166
Managers & directors in transport & distribution	3,497	4,460	4,234	1,381	1,154
Fork-lift truck drivers	3,074	3,921	3,722	1,135	935
Transport & distribution clerks & assistants	2,767	3,529	3,350	951	772
Aircraft pilots & flight engineers	1,622	2,276	2,117	765	606
Other drivers & transport operatives n.e.c.	1,278	1,630	1,547	583	500
Air transport operatives	1,135	1,593	1,482	529	417
Rail transport operatives	999	1,274	1,209	393	329
Train & tram drivers	670	855	811	229	185
Ship & hovercraft officers	623	747	719	230	202
Marine & waterways transport operatives	543	651	626	190	165
Importers & exporters	332	423	402	148	126
FTDL-14	45,795	58,676	55,636	18,601	15,562

The FTDL-14 encompasses four categories of road freight drivers: HGV vehicle drivers, fork-lift truck drivers, mobile machine drivers & operatives, and other drivers & transport operatives. These four categories comprise approximately 60% of the total baseline supply.

The shortfall as a percentage of 2011 employment conveys the quantity of labour needed relative to the baseline quantity. The results are set out in Table 7.10 below. The occupation-level shortfall rates range from 28% to 37% in the Delayed Adjustment Scenario and from 34% to 47% in the Recovery Scenario.

The demand for HGV drivers also ranks highly in terms of relative shortfall: 5th highest, at 43%, in the Recovery scenario and only one point lower than the highest, at 36%, in the Delayed Adjustment Scenario. This reinforces the need for additional drivers in almost any economic scenario. Indeed, even with no change in output, there would be a shortfall of some three thousand HGV drivers resulting from retirements.

In 2019, Chao Ji-Hyland and Declan Allen from School of Management, College of Business, Technological University Dublin (TU Dublin), published their research study titled ‘*What do professional drivers think about their profession? An examination of factors contributing to the driver shortage*’. In it they reference McKinnon et al. 2017, 111, who highlight that entry-level logistics roles (including drivers) have lower pay and lower status than entry-level positions in other industries, creating an unattractive proposition for skilled workers.

The driver shortage is not a new phenomenon, as it has been well documented a varying level of severity over the past 20 years. What is clear is that function of distribution is critical to efficient logistics and is often taken for granted. The cost associated with transportation is close to 55% of the total cost of logistics²³. A driver shortage hinders supply chain performance and increases costs that ultimately impact the consumer.

In 2017, a new research study for the EU TRAN Committee – ‘*Road Transport Hauliers in the EU: Social and Working Conditions*’ was published. The report has reiterated that drivers in the freight transport industry across Europe felt that the quality of various aspects of their role had deteriorated in recent years, including the standard of their working environment, income levels, the amount of non-standard and standard working hours, and the skilled work involved, creating issues around driver retention. Recognising the issues is critical in determining what solutions are needed to counter the driver shortage problem. If drivers themselves do not get job satisfaction and feel secure in their roles it becomes increasingly difficult to promote the profession to new entrants. But this is not the only issue. A level playing pitch for compliance with how drivers are paid needs to be considered. There is anecdotal evidence that drivers will move jobs for increased cash in hand, based on subsistence payments, that are not necessarily due. This has the consequence of facilitating reduced PAYE and PRSI payments to the State as employers keep the official wages low whilst subsidising the total payments with subsistence payments. Paying drivers for extra shifts outside of normal working hours is becoming more of a problem as drivers are using double tachograph cards to cloak all their weekly driving activity. The link must be made between effective enforcement of the Minimum Wage Act, working time and tachograph rules and correct payment of taxes by employers. The fact we need to mention this highlights the importance of a level playing pitch that is supported with effectively

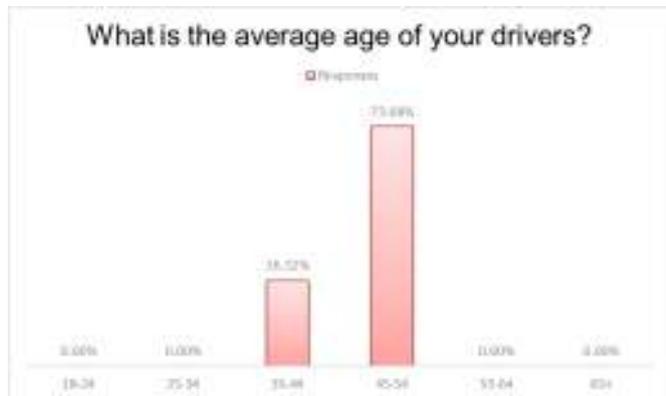
²³ Wilson, R. 2013. 24th Annual State of Logistic Report. Washington, DC: Penske Logistics, Inc



resourced enforcement. The net result if this is done right will deliver a more professional and compliant haulage sector.

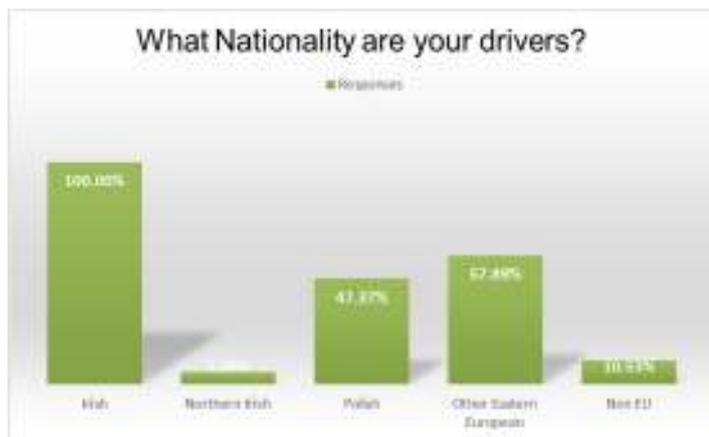
The TU Dublin report cited earlier also highlights those other issues for consideration in the appeal of driving jobs is the demanding and irregular nature of work schedules as a burden of the occupation. Drivers found their erratic schedule put a strain on their ability to balance work and family life²⁴.

A recent survey of FTAI members found that over the average age of drivers for over 73% of respondents is in the 45-54 age category. 26% of respondents average age of drivers are in the 35-44 age category.



When looking at nationality, 100% have Irish Drivers; 47% have Polish drivers and 57% employ other eastern European drivers with only just over 10% employing non-EU drivers. This Cohort participate in the non-EU work permit programme.

A tangible way to bring about a change in the perception of the sector is to invest in training and education. Training and education, upskilling and continuous professional development must become the norm and not the exception, if the sector is to succeed into the future. Industry must truly commit to adding value to careers in their companies and making them attractive to young people.



How can more people be encouraged to take up work in the road haulage sector, e.g., as HGV drivers, Transport Managers, customs roles, etc.? Please provide concrete suggestions/best practice examples.

Haulage sector employers must take responsibility to better promote their businesses and learn to compete for potential employees. Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the haulage sector. The Logistics and Supply Chain Skills Group is working on mapping out available roles and developing outreach programmes supported by logistics champions that will aid the generation of awareness of the industry.

Haulage sector employers must take responsibility to better promote their businesses and learn to compete for potential employees.

²⁴ Sousa, I. C., and S. Ramos. 2018. “Working Conditions, Health and Retirement Intentions: A Case Study of Truck Drivers.” *International Journal of Workplace Health Management* 11 (3): 114–129.



The *Managers Guide to Distribution Costs Report 2020*²⁵ shows that it is taking over 29 days to fill vacancies and the skills shortage is costing employers over €20,000 in additional costs. The report highlights that there is a gap in the perception that roles are poorly paid with the reality that driver's salaries rose in 2019 by 4.2%, to €35,839 on average, before subsistence payments.

The following should be considered in developing a strategy to encourage more people to take up work in the road haulage sector.:

- Employers must promote their businesses in a more positive manner.
- More robust auditing and oversight of operators by state agencies is required to identify, and hold accountable, employers who exploit drivers by e.g., expecting them to work excessive hours in contravention to working time regulations; no contracts of employment.
- Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving -
 - Support the establishment and delivery of the Level 6 Transport Operations and Commercial Driver Apprenticeship
 - Clearly identify all education and training programmes for the haulage sector.
 - Continue to develop ties between academia and industry.
- Employers must ensure that they have competitive terms and conditions for drivers and other roles that support loyalty within the workforce.
- Better and more consistent enforcement of non-compliant operators
 - Fuel laundering
 - Working time issues
 - Subsistence abuse
 - Brexit issues with imports/exports via Northern Ireland due to lack of enforcement.
- The average size haulage business is less than 6 HGVs. These Small to Medium Sized businesses are traditionally family run. The State can support better succession planning for this cohort through guidance and supports, similar to what Teagasc²⁶ has done for the farming community. With the average age of drivers now increased to over 50 years of age, and in a lot of cases including the business owner, these family businesses need to understand how to encourage younger siblings and/or offspring to get involved in the family business, or at least give them the option and give the younger family members an opportunity to gain experience in the business without having to relinquish ownership. (This is also a great opportunity for the Driver Apprenticeship to be considered as a pre-requisite necessary to support effective succession planning.)
- Consignor Liability – Much more needs to be done to raise awareness within the consignor cohort of their legal obligations when it comes to procuring third party haulage services. Consignors have a vested interest and legal responsibilities in ensuring that their hauliers are operating to the highest professional standards, but some turn a blind eye to such things as working time compliance, roadworthiness of vehicles, and overweight vehicles, instead focusing on contracting the cheapest service. The HSA, through its own activities and the work related vehicles safety committee, and the RSA should develop a robust campaign highlighting (and then reminding) consignors of their obligations in these matters.
- Training programmes should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services.

²⁵ <https://www.ftai.ie/wp-content/uploads/2020/10/FTAI-Managers-Guide-to-Distribution-Costs-2020-Report.pdf>

²⁶ <https://www.teagasc.ie/media/website/publications/2015/Farm-Succession-and-Inheritance-Guide.V1.pdf>



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

The profession of a HGV driver suffers from an image problem with low pay, long and unsocial hours, poor work environment and lone working sited for this perception. The current driver pool is ageing with an average age of over 50 years of age. The consequence of this is far reaching and will have a detrimental impact not just on individual organisations, but on the freight distribution and logistics sector as a whole in a number of years if the issues aren't dealt with urgently. Driving can also be a physical job with some requirement for loading and unloading, therefore it does not always sit well with an ageing work force. It is also important for employers in terms of managing safety and health and wellbeing of their staff that they are considerate of the physical demands the job imposes on their employees. This is assessed during periodic risk assessments. The obligation to do this would suggest that it would be in employers' interest to have a career path mapped out for their drivers with options to move roles within the organisation where possible. The challenge of course is how to attract young people into the profession of driving. The traditional way of getting involved was through family links and succession into the family business. This has changed. Offspring no longer see the job as attractive. This must change.

- Building on the experience of Brexit and Covid-19 government and industry should work together to shift perceptions highlighting the strategic importance of logistics to the Irish economy and criticality of professions such as HGV driving.
- There should be a focus on the aesthetics of the profession of driving. How drivers are presented, do they have uniforms, is personal hygiene of importance to the employer, what PPE is provided to drivers, and is it maintained to a high level.
- Drivers have a significant customer care role. They are the face of the business, so how they present themselves and interact with customers and the public is hugely important in defining the perception of the industry.
- All within the supply chain need to be educated and understand the role of a professional driver. Mapping out the day-to-day role of a driver, through case studies, and presentations by drivers is important in creating awareness of how varied, difficult and rewarding the job is at the same time as developing respect for the position.

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- Employers and stakeholders need to improve their communication with drivers to ensure that if there will be delays, they know and understand why this is the case. When there are gaps in the communication process it creates frustration for drivers who are obliged to work within the working time directive and tachograph regulations.
 - Education of those charged with goods reception in terms of how to interact with drivers needs to be promoted and supported by a form of driver charter – get respect, give respect – standardise demurrage charges etc.
- The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry.
- Government and industry should work together to ensure the cost of licence acquisition is not a barrier to new entrants.



A point that is linked with raising awareness of the profession and that creates a true perception of the industry is the importance of detailing the job opportunities within the supply chain including the haulage profession in secondary schools. Creating awareness of the role of professional drivers to young people may sow a seed of interest in a profession that may not otherwise have been considered. The apprenticeship programmes are supporting outreach to secondary schools through organised events and access to career guidance professionals. The Logistics and Supply Chain Skills Group is developing opportunities to get access to schools in this regard.

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

Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. Developing a strategy to create awareness within schools through transition year initiatives is one example that can deliver interest in the sector. Working collaboratively through stakeholder committees is also essential in creating a common approach to developing awareness of the sector. This has started in 2018 through the addressing the future needs report and is continuing through the Logistics and Supply Chain Skills Group.

More support is required for the establishment of training programmes and apprenticeships that support the haulage sector. The commercial driver apprenticeship delivered by Sligo IT (lead proposer FTAI) is scheduled to start in January 2022. This apprenticeship will offer significant opportunities through the recruitment of a project manager to highlight the benefits of commercial driving as a profession to students in secondary schools, parents of those students and the career guidance professionals. The Logistics and Supply Chain Skills Group must also harness this opportunity and work collaboratively broadening the scope and outreach of the Group in line with the development of this programme. The experience of the Logistics Associate Apprenticeship and the outreach from the project manager is a prime example of how successful this approach can be. There are over 90 students registered to start first year of this apprenticeship in TU Dublin and Munster Technological University in September 2021.

The haulage sector is changing apace. Technological advancement is ensuring that the industry is becoming more efficient and delivering for the environment. The haulage sector has traditionally been male dominated, however, better promotion of careers within the sector as well as new innovative practices means it will become more appealing generally as a viable profession, with more diversity and less gender stereotyping. Also key to the future success without doubt will be the prevalence of drivers that self-promote their profession.

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INTERMODAL TRANSPORT

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

Freight transport is to some extent being taken into account, however, there is a significant disconnect between the ambition to become more sustainable and the delivery of solutions that support sustainable logistics in urban settings. City council strategies, such as that of Dublin City Council²⁷, tend to focus on sustainability in terms for consumers and workers moving from cars to active transport to access the towns and cities without consideration for the delivery and collection of goods necessary for vibrant retail solutions. All retail, hotels, pubs etc. require regular deliveries of goods to provide their services. Planning for loading and collection bays appears not to be properly considered, with many sharing space with bus and cycle lanes, resulting in confusion, conflict and risk for road users.

Consideration must be afforded to the following:

- Delivery of a more effective and efficient transport infrastructure.
- Supporting efficient logistics through the planning system - Freight movements are actively discouraged by the planning system from delivery bays to cargo bikes, to the circumference of turns at junctions.
- As part of an integrated transport system, defining and supporting the use of Ultra Low Emission HGVs and give increased access to Low Emission commercial vehicles in urban areas.
- Incentivising integrated freight transport through grants and tax inducements.
- Ensure the power infrastructure required for zero emission vehicles is delivered.
- Carefully considering proposals for HGV restrictions due to the negative impacts of down-sizing.
- Ensuring the power infrastructure required for zero emission vehicles is delivered.
- Supporting vehicle manufacturers in the development and deployment of zero emission vehicles.

Online delivery to homes has surged in the last 18 months with the Christmas peak now becoming the norm year-round for last mile deliveries. However, the 'batch of one' is an inherently inefficient supply chain with large volumes of air freight being shipped by largely unregulated vans for the last mile delivery.

Whilst FTAI member companies have advised that they do their best to work with customers to reduce volumes - by switching from boxes to bags for example – ultimately, Local Authorities need to support urban and town centres with shared services that allow easy collection and returns (reducing 'reverse logistics' volumes).

As part of a more integrated approach to freight transport and transport planning, logistics providers should consider the following:

- Ask operators about their fuel efficiency policies/practices.
- Examine alternative mode possibilities for all trunking movements.
- Facilitate off-peak deliveries wherever possible, especially in urban areas.
- Anticipate in business planning those urban deliveries may become more expensive/difficult in future.
- Support flexible supply chains to facilitate use of alternative power sources for vehicles.

²⁷ <https://www.dublincity.ie/dublin-city-development-plan-2016-2022/7-retailing/75-strategic-approach>



Urban area transport planning strategies allow for the introduction of specific delivery arrangements in large urban centres and low impact delivery schemes. Are such initiatives working well?

Urban transport plans are, for the most part, deficient as they do not include details regarding freight distribution within urban settings. Urban settings include residents that require home deliveries as well as businesses and retail, hotels, pubs/restaurants, tourist sites etc. All require a complex supply chain to ensure that they are serviced effectively and efficiently. All plans should take account of the complexity of freight distribution rather than taking it for granted. In a lot of cases planning permission is granted for commercial purposes without taking account of the complexities of deliveries and the space needs for HGVs and LCVs to carry out collections/deliveries in a timely and safe manner. For thriving urban centres more must be done to support the freight distribution and logistics sector to carry out their services in a safe manner and to co-exist with other road users.

Consideration should be given to the following:

- Permit and incentivise night deliveries by alternative fuelled vehicles including electric/CNG/LNG/Hydrogen vehicles, or EURO VI.
- Euro VI should be the minimum criteria for urban deliveries inside the M50 and similar ring roads around cities.
- Retailers should facilitate off-peak distribution/deliveries, thus alleviating traffic congestion and leading to safer distribution.
- More consideration and space needs to be provided for on-street deliveries. Planning must take account of the space needed for safe and efficient deliveries. The size of the vehicles required to service commercial buildings must be considered. This will reduce traffic congestion, improve safety, and reduce the levels of conflict between vulnerable road users and professional delivery personnel.

Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?

Rail freight can play a very important part in the economic functioning of Ireland. Over the years the number of live railway lines operating for day-to-day use has reduced. In line with EU transport policy promoting inter modal connectivity, Ireland must again consider rail as a viable option for freight. Of course, economies of scale play a defining role in ascertaining the viability of this mode for the freight distribution and logistics sector. Whilst planning for the future is recommended, we cannot shy away from the fact that the economic hubs in Ireland are in limited locations. In order to be viable, rail freight needs economies of scale. If the infrastructure is good enough the opportunities will present themselves to aid the growth in rail freight. What is certain is that significant investment in the rail network and infrastructure is a prerequisite to providing industry with the confidence that rail freight is a viable alternative to road transport.

- Feasibility of rail freight is the first challenge when considering how an increase in rail freight infrastructure or capacity could best benefit the haulage sector. An individual company must examine their entire supply chain and calculate current costs per tonne moved. The company must then look at any service level agreements with their customers, consider the location of depots and delivery points, and work out if there's a rail distribution hub within a reasonable distance of the customer base. This point alone highlights the fact that the opportunities for rail freight in Ireland are very limited. Focus therefore must be on developing the lines that can support future rail freight movements.



- Journeys above 300km (the distance between destinations considered necessary to make rail freight viable) are few and far between in Ireland, consequently prioritising industrial development adjacent to existing rail lines and sidings is prudent. However, even where rail transport is viable HGVs may still be needed for the final mile.
- Moving freight quickly out of ports into inland consolidation/distribution centres will improve efficiencies for distribution, reduce traffic congestion and improve air quality.

What are the barriers which prevent movement of freight by rail?

- Recent studies suggest there may be savings in moving part or full consignments by rail. Grants should be considered by Government to help offset the initial and subsequent costs of moving to non-road modes of transport.
- The advantage of transporting goods by road is that the haulier has greater control over the departure time and can calculate delivery times with a certain degree of accuracy. Timely deliveries of goods by rail will be impacted by the rail schedule, and the quality and reliability of the rail network.
- The geographical size of the country mitigates against the use of rail freight with, in general, a 300km of distance between stations considered necessary to make rail freight viable. Efforts to increase the use of rail freight should therefore be concentrated on routes that have significant freight movement requirements. A good example of this is the new twice-weekly rail freight service between Ballina (County Mayo) and the Port of Waterford.

What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?

Inter Departmental / Inter agency synergies need to be developed as a part of a national logistics strategy. Ireland's global competitiveness is reliant on a strong private sector supported by sensible Government policy. As an island nation we are reliant on our ports for our global connectivity. Air cargo, and particularly night flying, has numerous benefits including:

- Enables trading relationships.
- Makes Ireland a more attractive place to do business.
- Supports advanced logistics and supply chain functions.
- Enhances the ability of Irish based companies in providing the highest levels of customer care and after sales service.
- Increases consumer choice.

Dublin Airport is Ireland's busiest cargo airport, handling 90% of the country's air freight and 35% of all Ireland's trade by value. Currently a new 'North Runway' is being constructed. When completed planning conditions will kick in that will reduce the allowable number of night-time flights to 65 runway movements. There is an ongoing process to review the planning conditions associated with the new runway, including the 65-movement cap.

Given the criticality of this period for air freight operations, FTAI made a submission to Fingal County Council calling for the exemption of all cargo flights from any night curfew, and the removal of the upper limit on night movements at the airport. Reducing the number of night flights at the same time as introducing a second runway is not conducive to supporting the economic recovery of Ireland and future proofing our reputation as a country that is 'open for business'.



As an island on the periphery of Europe, we are reliant on effective and efficient multi-modal connectivity. Dedicated air freight integrators allow Irish businesses to send financial, legal or business documents, critical manufacturing components, perishable produce, urgent consumer goods and time critical medical and pharmaceutical products over night to arrive the next day. Express cargo services are about mission critical timeframes, fine margins, and speed. Downgrading the system at any point means that it will not work. If access to Ireland is constrained, Ireland and Dublin's competitiveness will weaken as suboptimal service levels manifest themselves.

Brexit and Ireland's geographic location mean that to remain competitive, links to global markets must be nurtured. As the first six months of 2021 are demonstrating, Brexit will redefine the Irish supply chain. As the gateway to Europe, Ireland will become a more attractive destination for international trade. The infrastructure is being developed to support this, but it must be utilised in a balanced manner. Movement of freight by air will become more popular, which, if supported, will drive and support the economic recovery. Traditionally the supply chain in Ireland has over relied on movement of goods by road and sea. Now that the UK is no longer part of the EU, the supply chain in Ireland needs to be supported in adapting to the new trading reality and to develop new connections to continental Europe and the world. Two of the main global air cargo hubs in Europe are Paris (Charles du Gaul) and Frankfurt, both over 1,000km from Dublin. Connectivity between these hubs is now more attractive than Heathrow in London. Night flights are central to supporting high value manufacturing exports where over 80% of the freight handled at night in 2018 was imports, with the early morning arrivals, mainly operated by express freight airlines, accounting for around 28,500 tonnes of goods moved.

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SUMMARY OF KEY POINTS

Topic	Question	FTAI Recommendations
<p>COVID-19</p>	<p>What lessons can be learnt from the COVID-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Ireland’s supply chains?</p>	<ul style="list-style-type: none"> • Emergency response committees to include stakeholders from the freight distribution and logistics sector. • Better communication from agencies with responsibility and links to the supply chain is critical. • The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. • Consistent approach from all EU member states to support movement of goods. • Recognition that all in the freight distribution and logistics sector are essential workers.
	<p>Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?</p>	<ul style="list-style-type: none"> • Create a sub-group of the Emergency Planning Government Task Force, with representation from the freight distribution and logistics sector. • The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging and should promote work related vehicle safety and driving for work compliance within the sector. • More flexibility to alleviating the expense associated with operating a commercial fleet. • State agencies charged with issuing motor tax or new vehicle registration / changed of ownership / operator licencing etc. must continue to be resourced and operate throughout the period.
<p>Brexit</p>	<p>What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?</p>	<ul style="list-style-type: none"> • further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector. • remove the requirement for entry and exit safety and security declarations. • Develop strong maritime links closer to key European Strategic locations (France/Netherlands/Belgium) is sensible and should be supported by Government policy. • Enhance supports for HCV drivers including facilities for hauliers at ports. • Guidance needs to be developed for Authorised Economic Operators (AEO). • Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). • Sufficient resources should be provided at Irish Ports for parking, road accessibility and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. • Synergies between the state agencies assigned with responsibility for customs. Sanitary and Phytosanitary checks, immigration and other regulatory controls need to be developed through IT systems.



	<p>What is needed to incentivise less polluting Light Commercial Vehicles?</p>	<ul style="list-style-type: none"> • Further toll charge reduction incentives • Funding for suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure. • Home chargers to be included for those operating company electric vehicles. • Grants for commercial chargers for leased vans not just owned vehicles. • Price of alternatives need to be comparable to diesel. <ul style="list-style-type: none"> • More places to fuel/recharge • Commercial SEAI grants at least matching private grants for Commercial vans. 3,800 vs 5,000 • Access to fast chargers e.g., longer cables on existing chargers. • Clarity should be provided on how the electricity that is used to recharge vehicles is produced (how much through wind energy) • More details and guidance should be provided on how and where batteries are sourced.
	<p>Should eco-driver training be rolled out further, for example, as part of Driver CPC training?</p>	<ul style="list-style-type: none"> • Define Eco driving in a manner that delivers results from a blended approach that includes in-cab training, classroom • Transport Manager CPC programme should be overhauled to reflect the technology and tools that future drivers and transport managers will be dealing with in the next 10-20 years • Driver training should not only be encouraged through the driver cpc module but also supported through the development of a code of practice for safe fleet operations, to include guidance regarding risk assessments and training for drivers similar to the driving for work programme
	<p>Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?</p>	<ul style="list-style-type: none"> • Authorities for Ireland’s main urban centres need to review their freight distribution movement plan and to develop a more freight friendly strategy that takes account of the environment, traffic congestion, local residents, vulnerable road users and the distributors themselves • different solutions for different sectors of industry, some of whom are already do a high degree of consolidation as it is the basis of their business. • For express parcel sector the following should be considered: <ul style="list-style-type: none"> ○ consolidation could drive inefficiencies through additional journeys, double handling of packages, vehicles dropping off volume and then traveling back empty. ○ Data protection – who owns the customer data? Customer data cannot be shared easily/legally.



		<ul style="list-style-type: none"> ○ Who deals with the customer service issue on the final mile in case of loss, damage, delayed deliveries? ● Micro consolidation sites within city centres do have value and should be explored. This offers the opportunity to deliver to designated hubs with perhaps double trailers where one is dropped in one location and one in another.
	<p>How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.</p>	<ul style="list-style-type: none"> ● Prioritise and encourage double length trailer usage. ● To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered business who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies. ● Another key challenge faced with expanding electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. ● Allow more efficient delivery opportunities outside peak hours. Trucks are getting quieter every year with silent electric trucks due from 2025. Take this into account when planning urban delivery rules. ● Make narrow delivery time windows wider to allow trucks to cope with the unusual traffic patterns to come. ● Capital support to de-risk service station supply of alternative fuels for electric / CNG / LNG etc. ● Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed; implement now to stop imports of dirty Euro I-V commercial vehicles from UK. ● Incentivise Euro VI & CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs – trucks bought today will be on fleet for next 4-5 years and on-road for 10-12 years! ● The current rate of excise applied to natural gas for transport use be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet. <ul style="list-style-type: none"> ● Last mile delivery. Support cargo bikes. Congestion charges in urban areas <ul style="list-style-type: none"> ● Barrier free tolling ● Smart Motorways – betting traffic Management, particularly in Urban centres ● Encourage holistic approach to carbon transition by providing necessary education and training to develop competencies. <ul style="list-style-type: none"> ● Support Biomethane production ● Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer.



		<ul style="list-style-type: none"> •
<p style="text-align: center;">Road Safety</p>	<p style="text-align: center;">What are the road safety priorities in road haulage for the next 10 years?</p>	<ul style="list-style-type: none"> • Create more awareness around the implications of poor driving behaviour. • Authorities charged with regulating the industry must be sufficiently resourced. • Powers to immobilise vehicles where there is issues with cabotage , roadworthiness or tachograph. • Review must take place in Ireland of the powers afforded to the RSA inspectors.. <ul style="list-style-type: none"> • Smart Card – one card to contain all licencing information and driver qualifications/certification. • Electronic Roadworthiness Cert for trailers • Adopt Driver CPC training programme to allow CPD (Continuing Professional Development) that would recognise specialised certified training. • New road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies. • Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations. • Graduated Fixed Penalties should be introduced. • Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues. • The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. • Carry out a media campaigns on the correct use of lighting for vehicles to include flashing amber. • The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes. • Milk collection operations should come in under the tachograph regulations as this service is predominately carried out by the licenced haulage sector. • Promotional activities surrounding medical fitness to drive including good eating habits and the links with improved road safety should be developed for the haulage sector.
	<p style="text-align: center;">How are these priorities best addressed?</p>	<ul style="list-style-type: none"> • Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change. • Specific actions should be developed with clear allocation of responsibility. • A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy.



		<ul style="list-style-type: none"> Necessary provision of resources for the RSA and An Garda Síochána RSA to appoint a liaison for the freight distribution and haulage sector.
	What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?	<ul style="list-style-type: none"> Regular engagement with stakeholder that are willing to work with the authority. The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets.
	What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?	<ul style="list-style-type: none"> Consolidation of Legislation The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns
Mobility Package	What are your views on how Ireland implements the Mobility Package changes?	<ul style="list-style-type: none"> Support the establishment of a 'body' with overarching responsibility for commercial transport operations. Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant. It is important that authorities in Ireland do not create an unfair environment for Irish business by not implementing elements of the Package that are rigorously enforced in other Member States. The Department of Transport is currently responsible for operator licencing in Ireland. Will Van licencing sit in this Department?
	What are your views on the return of the truck?	<ul style="list-style-type: none"> As the Ireland being an island state FTAI seek consideration for compensation for the increased costs of connectivity with continental Europe and or a derogation seeking an exemption from the requirement to return to Ireland within 8 weeks
Road Infrastructure	Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?	<ul style="list-style-type: none"> Consideration must be given to our key strategic ports and the facilities available to drivers. fair, proportionate and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture that recognises the legislation and the regulations as underpinning a fair, competitive safer environment for all.
	What more is needed in relation to road user charging for freight transport in Ireland?	<ul style="list-style-type: none"> Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport. A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. FTAI would like to see the money collected to provide better infrastructure within certain constraints.



		<ul style="list-style-type: none"> • The current reduction in Toll rates for users of 'Alternative Fuels' should continue.
<p style="text-align: center;">Labour Market/ Skills</p>	<p>How can more people be encouraged to take up work in the road haulage sector, <i>e.g.</i>, as HGV drivers, Transport Managers, customs roles, <i>etc.</i>? Please provide concrete suggestions/best practice examples.</p>	<ul style="list-style-type: none"> • Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the haulage sector • Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving • Better and more consistent enforcement of non-compliant operators • Support better succession planning through guidance and supports. • Consignor Liability - Raise awareness by contractors of haulage services of their legal obligations. Guidance should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services. (this can be included in the proposed Code of Practice for the haulage sector) • The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry.
	<p>How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?</p>	<ul style="list-style-type: none"> • Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. • More support is required for the establishment of training programmes and apprenticeships that support the haulage sector