An Roinn Iompair
Department of Transport

Public Consultation on a Ten-Year Strategy for the Haulage Sector – Summary Report

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Background to the Consultation

In line with the Programme for Government and the Climate Action Plan 2021, the Department of Transport is working towards developing a ten-year strategy for the haulage sector. The department launched a public consultation on 9 April 2021 to seek stakeholder and citizen views on the development of the strategy.

This consultation ended on 16 July 2021, extended from 2 July 2021, though late submissions were also accepted. A total of 43 submissions were received, which have been analysed by consultants from Ove Arup & Partners Limited on behalf of the department. This summary has been prepared by the Department of Transport based on that analysis.

Objective of the Public Consultation

The Government's aim is to develop a haulage strategy that will focus on generating efficiencies and improving standards, and help the sector move to a low-carbon future. The objective of the public consultation was to collect views and opinions on what measures are needed to deliver on these aims, in particular decarbonising the haulage sector, which represents a significant challenge, but which is required to make commercial road transport operations more efficient and sustainable and to meet Ireland's climate commitments.

Scope of the Public Consultation

There were in total 8 sections in the consultation document, with 26 questions posed as reproduced in the following table.

Topic	Question
COVID-19	What lessons can be learnt from the COVID-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Ireland's supply chains?
	Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?
Brexit	What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?
	How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?
Sustainability and Decarbonisation	What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?
	What is needed to incentivise less polluting Light Commercial Vehicles?
	Should eco-driver training be rolled out further, for example, as part of Driver CPC training?
	Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?
	How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.
Road Safety	What are the road safety priorities in road haulage for the next 10 years?
	How are these priorities best addressed?
	What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?
	What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?
	Do you have any other comments on road safety matters?
EU Road Transport Policy	What are your views on how Ireland implements the Mobility Package changes?
	What are your views on the return of the truck?
Road Infrastructure	Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?
	What more is needed in relation to road user charging for freight transport in Ireland?
Labour Market and Skills	How can more people be encouraged to take up work in the road haulage sector, e.g., as HGV drivers, Transport Managers, customs roles, etc.? Please provide concrete suggestions/best practice examples.
	How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?
	How can the ability of the haulage sector to attract and retain talent be strengthened to service the demand for skills over the coming years?
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?
	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?
	Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?
	What are the barriers which prevent movement of freight by rail?
	What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?

Who Replied to the Consultation?

The consultation targeted all interested stakeholders from the public and private sectors, including government, local authorities, commercial and non-commercial organisations, experts, academics, and citizens.

The 43 responses came from across a variety of sectors but mainly from those representing, or part of, the haulage and freight industry. The highest responses by number were from 'Logistics & Transport' operators (16) and 'Training & Development' providers (7). The full list of respondents is attached in 'Appendix A'.

Submissions received are now published on the website of the Department of Transport.

As outlined above, a number of questions were posed. However, respondents were not confined to answering these questions, which were aimed at assisting contributions.

Assessment of Responses

Ove Arup & Partners Limited on behalf of the Department of Transport reviewed the submissions received. Key insights and suggestions were collated under each topic area. This resulted in a short-list of key suggestions.

Each key suggestion was subsequently assessed by Arup and the Department against the following three criteria:

	Commonality *How often was this suggestion made by different respondents*	**Alignment** *How much does this suggestion align to existing policies*	**Addresses/Solves** *Does this suggestion address the questions asked, or assist in solving the issues raised in the consultation*
Red	Only one respondent made this suggestion	Does not closely align with existing policies	Does not address the question asked in the consultation
Amber	A couple of respondents made this suggestion	Somewhat aligns with existing policies	Partially addresses the question asked in the consultation
Green	Many respondents made this suggestion	Aligns with existing policies	Addresses the question asked in the consultation

The list of key suggestions is presented in the following pages categorised per topic area.

COVID-19

Questions

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

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

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Create a sub-group of the Emergency Planning Government Task Force (response committee), with representation from the freight distribution and logistics sector.			
National emergency planning group needs to engage with HGV industry about emergency planning in respect of exceptional events such as severe weather, future pandemic.			
The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders.			
Guidelines for operation of the sector during a crisis /contingency planning (future proofing supply chain etc.).			
Flexibility in alleviating expenses and providing supports in times of crisis (e.g., COVID-19 supports).			
Better communication from the agencies about crisis measures and pro-actively engaging with stakeholders to ensure consistent messaging. Better communication between stakeholders.			
Improve data sharing and utilisation across agencies (including traffic and freight data).			

Brexit

Questions

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

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

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Enhance supports for HGV drivers including facilities for hauliers at ports. Protect and improve access to ports.			
A higher degree of IT Systems integration and simplification across Government Departments.			
A higher degree of integration EU/UK systems			
Develop strong maritime links closer to key European Strategic locations (France/Netherlands/Belgium).			
A Land bridge route should be supported through a uniformed custom approach, and requirements for Irish Goods (which are EU goods) re-entering the single market through the Land bridge should be seamless, in order to level the playing field between RoI and NI ports.			
A pragmatic and flexible approach to the Rules of Origin provisions of the TCA needs to be adopted.			
Consider observer status for industry representatives in the EU-UK TCA Specialised Committee on Road Transport.			

Sustainability and Decarbonisation

Questions

1. What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?
2. What is needed to incentivise less polluting Light Commercial Vehicles?
3. Should eco-driver training be rolled out further, for example, as part of Driver CPC training?
4. Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?
5. How can we work to promote more efficiencies within the sector?
6. Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Infrastructure support e.g. Consolidation / Distribution centres, Refuelling Infrastructure etc.			
Promote and encourage Eco driving. Create road conditions that facilitate Eco driving.			
Ban imports from the UK of older EURO IV / V vehicles, take the older more polluting trucks in Ireland off the road.			
Financial/pricing incentives (purchase incentive, scrappage incentive, reduced toll charges etc.) to support the uptake of EURO VI and alternatively fuelled trucks.			
Need for realistic transition deadlines and also information sharing and awareness about impacts, EU Green deal etc.			
Integrate rail into the freight distribution system to contribute to sustainability and decarbonisation.			
Multifuel Safety Framework should be considered to provide guidance and information as to the viability and availability of alternative fuels.			

The wider acceptance of night operations and facilitating 24-hour deliveries could bring efficiencies as transport networks are uncongested for portions of the day.			
Wider adoption of internet-based load matching.			
Possible introduction of longer trailers, taking into account limits per axle and consideration of safety impacts.			
Review of the provision of facilities and legislation to enable e-assist cycle and walker solutions.			
Decrease the importation of products which we produce here in Ireland.			
Use of gas (biomethane) HGVs as bridging solution.			
Coordinated research into the feasibility and cost effectiveness of the electrification of motorways with catenary power.			

Road Safety

Questions

1. What are the road safety priorities in road haulage for the next 10 years?
2. How are these priorities best addressed?
3. What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?
4. What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?
5. Do you have any other comments on road safety matters?

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Adopt and incorporate CPC/CPD/ECOdrive Training Programme.			
Improve safety-related road infrastructure and better network planning (reducing conflict with vulnerable road users). Development and upgrading of protected pedestrian and cycling facilities along or adjacent to the National Roads.			
Educate and create awareness about safety, poor driving behaviour, dangers etc. Educate cyclists as to the dangerous dynamics in the proximity of HGVs.			
RSA's Road Safety Strategy (2017-2030) must be implemented, appropriately monitored, and haulage strategy must be aligned with it.			
Award / assurance scheme on safety performance / compliance.			
Promotion of good mental health and well-being for haulage drivers by supporting and promoting healthy eating and communicating the importance of good practices to reduce driver fatigue.			
Support the establishment of a 'body' with overarching responsibility for commercial transport operations.			

Encouraging HGV drivers to make further use of safe and protected Motorway Service Areas could prevent onset of driver fatigue and reduce fatigue related accidents.			
The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns. Training and information sharing workshops.			
Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change			
Consider adoption of a fixed charge system for road transport offences.			
Ensure fair and effective enforcement of Road Safety Regulations.			

EU Road Transport Policy (Mobility Package)

Questions

1. What are your views on how Ireland implements the Mobility Package changes?
2. What are your views on the return of the truck?

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
RSA should continue to engage with the EU working group, publish simplified guidance material on relevant rules and engage with stakeholders regarding enforcement.			
There is a need to digitise all operators and on-road enforcement systems.			
Acknowledge the importance of effective and efficient enforcement of the requirements of the EU Mobility Package. Adopt new legal provisions.			
Consideration for compensation for the increased costs of connectivity with continental Europe or a derogation seeking an exemption from the requirement to return to Ireland within 8 weeks.			
Decide a national position on the return of the truck, preceded by a scientific evaluation of its impact on the Irish road haulage business, economy, supply chains and consumers			
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.			
A review must take place in Ireland of the powers afforded to the RSA inspectors.			
Create an ad-hoc public-private task force, with the participation of the IRHA, to advise upon and monitor the work on the MP1 and e-FTI implementing and delegated acts, and the practical implementation and enforcement of these new MP1 rules in Ireland and across the EU.			

Road Infrastructure and Usage Charging

Questions

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

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

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Incorporate proper loading/unloading facilities, manoeuvring space, secure parking, refuelling points, improvised road sightlines, express lanes, rest facilities etc.			
Clear guidelines need to be developed to advise industry of the plans for future road user charging for freight transport.			
Incentivise academic and industry involvement with long-term forecasting and modelling capacity for benchmarking, investment, planning and reform purposes.			
Consideration should be given to removing/reducing road tolls for goods-carrying HGVs. Introduce Express HGV lanes at tolls. Charge less for loaded HGVs to encourage hauliers to work harder on minimising empty running. Reduction in Toll rates for users of 'Alternative Fuels' should continue.			
Invest in digital infrastructure: freight technology, data collection etc.			

Labour Market and Skills

Questions

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

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

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

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
Aim to improve youth prospects in the Haulage Industry by bridging the gap between school and wheel by developing a clear pathway, collaborate with Dept. of Education, make haulage more attractive to students,			
Offer clear career progression to both men and woman, subsidise education, professionalise the career			
Improve gender balance within the industry.			
Support apprenticeships, support the development of apprentice schemes for new entrants. Government support to mandate insurance cover for apprentices in training.			
Improve working conditions (health, renumeration, support etc.), improve perception through communication, promote a healthy work/life balance, use market led policy development.			
Map and understand gap in labour demands (e.g., digital skills, sustainability, supply chain management), up-skilling for those currently employed, pathways for young drivers vs. established drivers. A better understanding of automation and the future need for drivers (poor understanding creates tension).			
Centrally mandate better pay and conditions. Set apprentice and qualified driver wages using for example, Sectoral Employment Orders. Government support to mandate insurance cover for apprentices in training.			

Consider extending drivers' hours within safe limit.			
Target non-compliance with standards for the industry, improve visibility and reputation of industry.			
Actively recruit hauliers from outside the EU by simplifying the work permit system.			
The deployment of modern, suitable, zero-emission haulage vehicles, such as Hydrogen fuel Cell vehicles should help make a career in the Sector attractive to a wider range of young people			
A key requirement for this sector is an EU wide set of skills standards with greater integration and standardisation.			

Integrated Transport Planning and Intermodal Transport

Questions

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

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

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

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

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

Suggestions	Commonality	Alignment with Existing Policy	Addresses/Solves
There is potential for rail to decarbonise haulage. However, it is vital to make sure that the network is efficient connected to key nodes and to consider "first and last mile" associated interchange costs when assessing the feasibility of carriage of freight by rail.			
Reducing HGVs in urban areas, urban logistics activities need to be reconsidered (low-impact delivery), switch to LGV's for last-mile, develop (cargo/e-) bike network. Grant and/or support for electric cargo bikes. Move van to cargo bikes. Segregated cycle lane to free streets.			
Consideration should be given to permitting and incentivising night deliveries by alternative fuelled vehicles, setting minimum criteria for urban deliveries, facilitation of off-peak distribution/deliveries.			
Road freight transport must continue to be taken into account in the development of Irelands transport planning system. Planning must take account of the space needed for safe and efficient deliveries.			
To reduce HGVs trip to/from city centres, a potential solution would be urban consolidation centres (UCC). The feasibility of consolidation centres and break-bulk facilities outside of the national road network in the medium term, should be examined.			

Land-use planning with regards to incoming freight and accompanying challenges (congestion). Land-use planning considered further in light of freight operations.			
Barriers to the usage of rail for freight movements – limited infrastructure and services, cost competitiveness, can be overcome by all stakeholders working together and using Rail Freight 2040 Strategy as a framework for rail freight development. This would include rail and road leveraging of their respective strengths and the development of distribution and logistics centres concentrated around modern rail intermodal terminals.			
Dublin Port Company highlighted the importance of road schemes to improve the hinterland access for Rosslare Harbour and the Port of Cork to enable these ports handle the spill over demand that will emerge as Dublin Port approaches its ultimate capacity.			
Ensure the ongoing resilience of TEN-T network through efficient and effective transport to the airport and access to our Core TEN-T ports. Removal of bottlenecks on routes to key ports/airports is required to maintain and improve journey time reliability to international connections.			
Consider traffic demand management for retail logistics construction logistics, reverse logistics, and other service-related freight transport in urban areas.			
Introduce no upper limit restrictions on the number of night flights. Restrictions on night flights, in particular, will result in additional pressures on early morning and evening road capacity when public and private transport serving the airport and transiting through the roads in the environs of Dublin Airport is at its heaviest.			
Provision of an alternative surface-based Dublin Port access route, to be used in the event of short or long-term unavailability of Dublin Tunnel.			

Summary of Key Insights

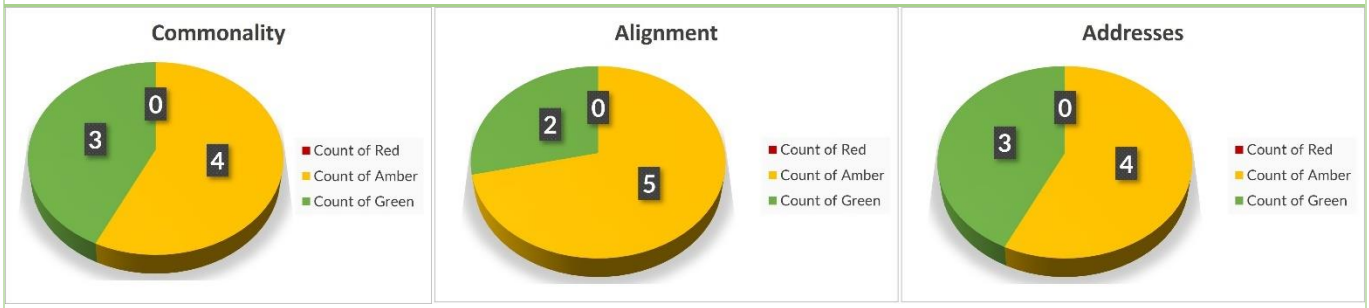
As explained above, each topic was assessed against the following three criteria:

- **Commonality** – How often was this suggestion made by different respondents;
- **Alignment** – How much does this suggestion align to existing policies;
- **Address/Solves** – Does this suggestion address the questions asked in the consultation, and assist in solving the relevant policy challenges.

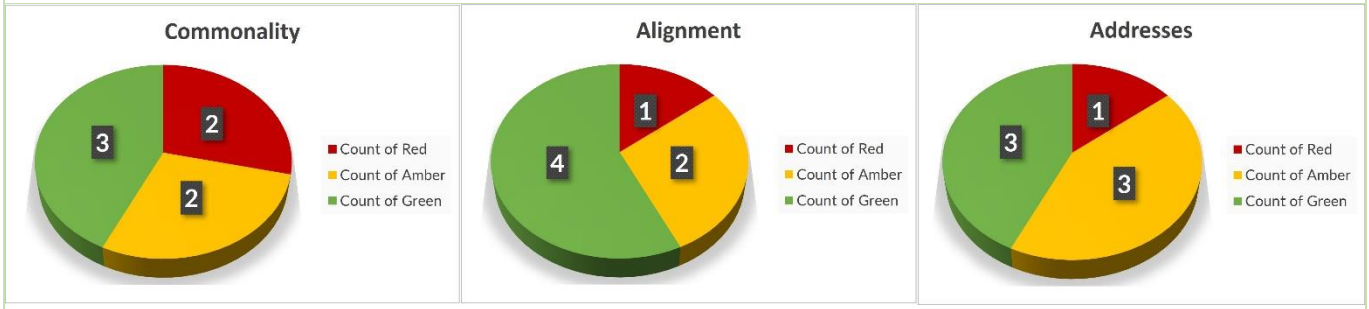
The pie charts below summarise at a glance the consultation responses for each topic area, based on the categories above, and represent visually the extent to which the suggestions in each section were raised by stakeholders, align with existing policy, and address/solve the issues raised in the consultation. For example, in the Brexit section, for the 7 suggestions received:

- 3 were raised by many respondents, 2 were raised by a couple of respondents, 2 of the suggestions received were submitted by one respondent.
- 4 of the suggestions aligned with existing policy, 2 aligned somewhat with existing policy and 1 did not closely align with existing policy.
- 3 of the suggestions fully addressed the question/issue raised in the consultation, 3 partially address the question asked in the consultation and 1 did not address the question.

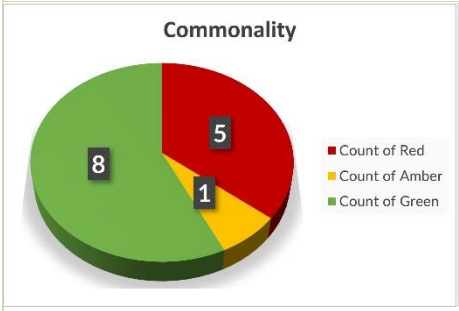
COVID-19 – 7 suggestions

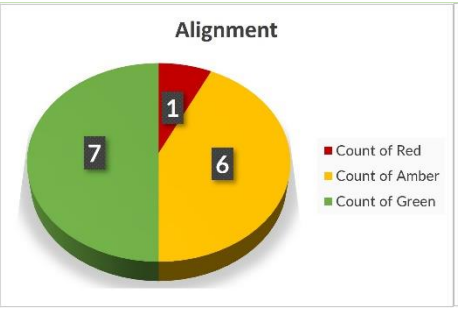


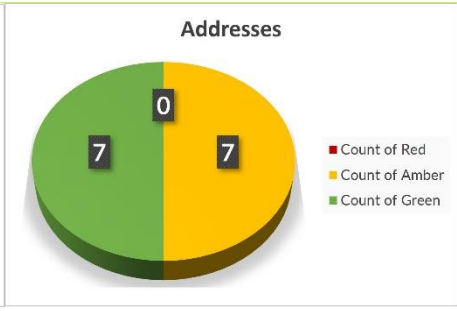
BREXIT – 7 suggestions



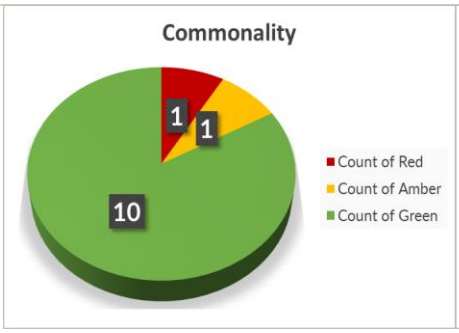
SUSTAINABILITY AND DECARBONISATION – 14 suggestions

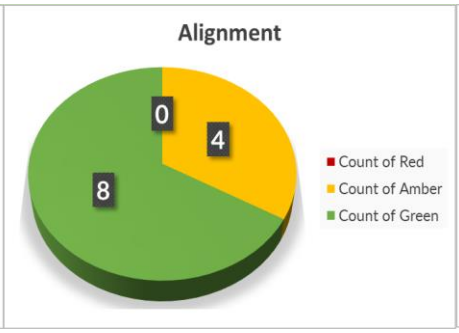


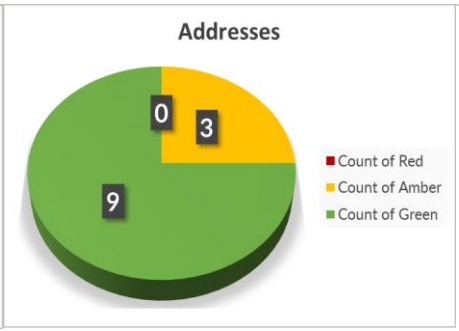




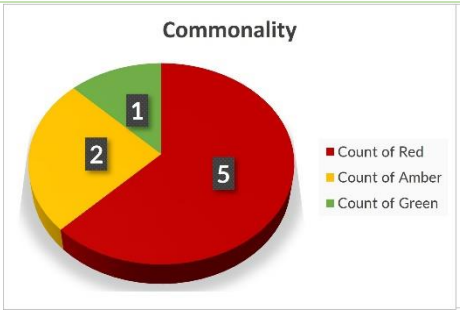
ROAD SAFETY – 12 suggestions

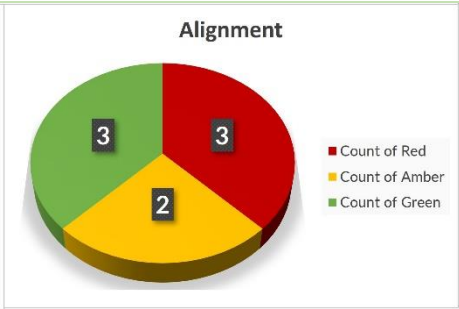


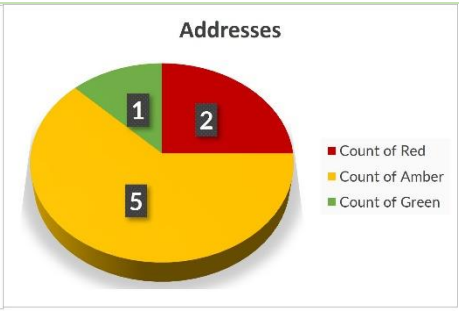




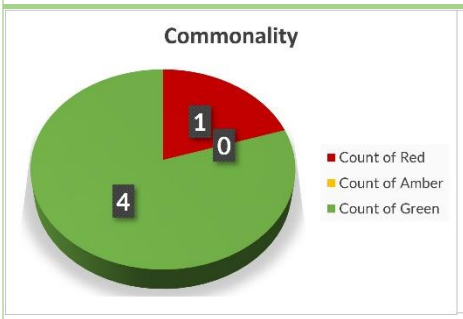
EU ROAD TRANSPORT POLICY (MOBILITY PACKAGE) - 8 suggestions

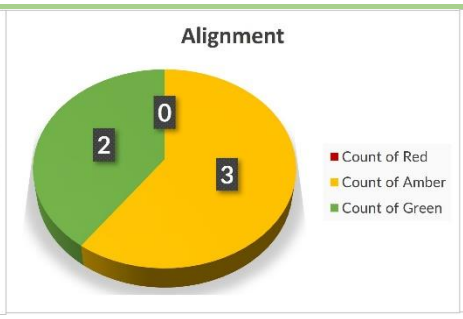


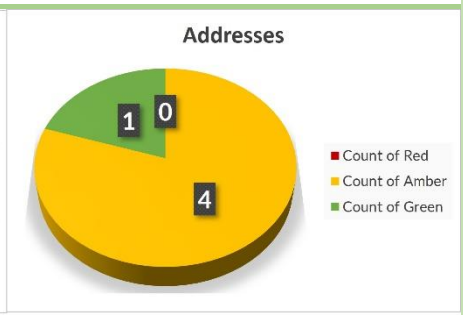




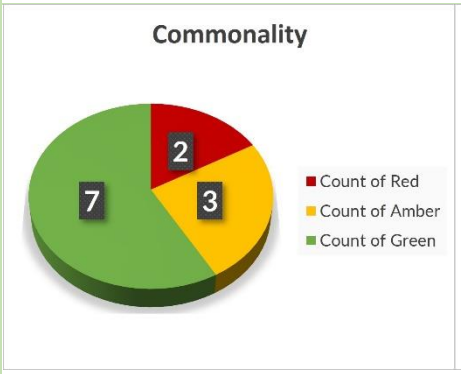
ROAD INFRASTRUCTURE AND USAGE CHARGING - 5 suggestions

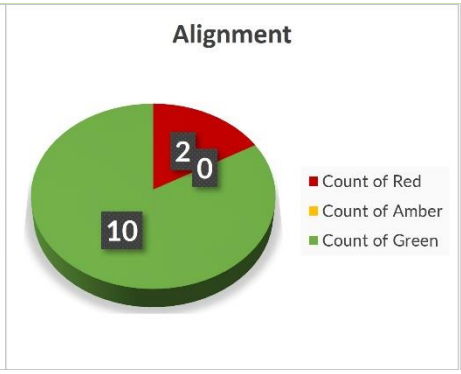


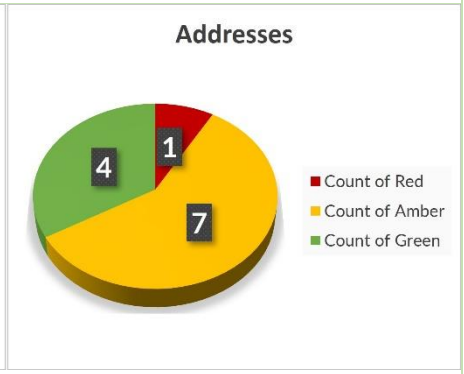




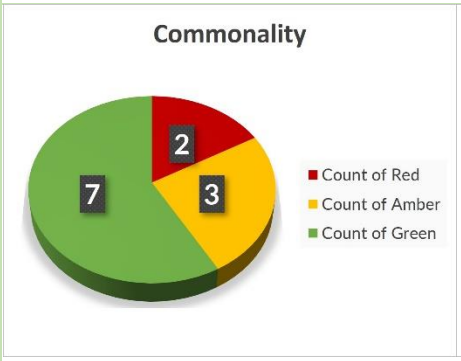
LABOUR MARKET AND SKILLS - 12 suggestions

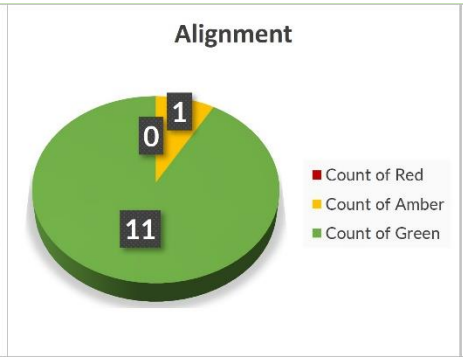


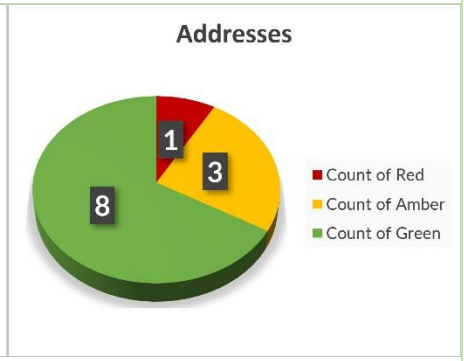




INTEGRATED TRANSPORT PLANNING AND INTERMODAL TRANSPORT - 12 suggestions







Conclusion and Next Steps

The public consultation exercise was the first significant step in delivering on the commitment in the Programme for Government: Our Shared Future to bring forward a ten-year strategy for the haulage sector.

This strategy will lay out the Government's approach over the long term to support and sustain the sector in moving to a low carbon future, improving standards and in addressing labour and skills needs. The consultation submissions will be used to guide the development of the strategy.

It is expected that a draft strategy text will be made available to stakeholders for further consultation in early Autumn 2022. Following this and taking into account any feedback, the strategy itself will be finalised before end year, with implementation to begin immediately thereafter. Further engagement will take place to inform and put in place structures to drive implementation in partnership between Government, industry and all other stakeholders to ensure successful and rapid delivery on the strategy's objectives.

Appendix A – Full List of Respondents

Submission Party	Location	Sector
Authentic Energy Management Services (AEMS)	Co. Dublin	Training and Development
Bridgestone Ireland	International	Vehicle Equipment
Chartered Institute of Logistics and Transport (CILT)	National	Logistics and Transport
Circle K	International	Fuel
Clavin Transport Services	Co. Westmeath	Logistics and Transport
Clean Ireland Recycling	Co. Clare	Waste Management
Dublin Airport Authority	National	Aviation
Dennison Trailers	Co. Kildare	Logistics and Transport
Dublin Port Company	Co. Dublin	Ports and Shipping
Education and Training Boards Ireland (EBTI)	National	Training and Development
Elsatrans	Co. Kildare	Logistics and Transport
Eurotran	International	Logistics and Transport
Exceptional Load Services Ltd	Co. Wicklow	Logistics and Transport
Fingleton White	National	Energy
Fleet Transport Magazine	National	Journalism
Forestry Industry Transport Group	National	Forestry
Freight Transport Association of Ireland (FTAI)	National	Logistics and Transport
Galway Harbour Company	Co. Galway	Ports and Shipping
Gas Networks Ireland (GNI)	National	Energy
Glennon Brothers	National	Forestry
Hydrogen Mobility Ireland	National	Energy
Iarnród Éireann	National	Rail
IBEC	National	Multiple
Irish Exporters Association (IEA)	National	Multiple
Irish International Freight Association (IIFA)	National	Logistics and Transport
Irish Road Haulage Association (IRHA)	National	Logistics and Transport
KT Business Skills ICE Group	Co. Galway	Training and Development
Masterlink	National	Logistics and Transport
Mayo, Sligo & Leitrim Education and Training Board (MSLETB)	Co. Mayo	Training and Development
Mid-West Regional Skills Forum	Co. Limerick	Training and Development
Nolan Transport	International	Logistics and Transport
Polar Ice Ltd	Co. Cork	Industrial
Road Safety Authority (RSA)	National	Logistics and Transport
SGS Ireland	International	Consultants
SOLAS	National	Training and Development
South Coast Logistics	Co. Cork	Logistics and Transport
South East Regional Skills Forum	Co. Waterford	Training and Development
Southern Regional Assembly	Co. Waterford	Multiple
Dileep Kumar Reddy	International	Logistics and Transport
UPS	International	Logistics and Transport
TII	National	Transport Infrastructure
Verona Murphy	Wexford	Politics
Sean Lawler	Kildare	Logistics and Transport

An Roinn Iompair
Department of Transport