Wednesday, 25 April 2017

NationalMitigationPlan@DCCAE.gov.ie

Draft National Mitigation Plan Consultation

Climate Policy Division
Department of Communications, Climate Action and Environment
29 – 31 Adelaide Road
Dublin 2
D02 X285

"Draft NMP consultation and AEMS"

Great to see the prominent role for transport in this consultation paper. However,

- The paper fails to highlight the personal and business cost of our transport choices. Recent presentations by DTTAS’ Laura Behan highlighted CSO figures showing transport costs are the third highest household bill and rising with our increasingly dispersed settlement patterns.
- Many of the Mitigating Measures under Consideration (4.5) are long overdue and a sense of urgency is needed; Preserve the transport emissions allowance we have (from 1990/2005) for growth in commercial road transport and maritime, to preserve jobs and sustain exports.
- A glaring omission from the plan is energy management. Any greener or more efficient car, van, bus or truck can be operated badly, wasting operators’ investment, increasing emissions and destroying investors’ confidence in new technologies and/or alternative fuels. ECOdriving is not an answer in itself, drivers need feedback to sustain savings.

On the path to 80% reductions in emissions by 2050, we appreciate there are no easy choices for legislators or operators. Our low cost answers to Questions 2, 4 & 5 are overleaf.

Yours sincerely,

Conor Molloy MSc (Energy) CMVP
Managing Director
2. Practical measures to reduce car use

As the NMP outlines, car use is Ireland’s largest and fastest growing source of emissions, car driving in congested road space adds little to societal wellbeing nor to our planet’s and children’s future.

Government communications need to highlight the costs and impacts of congestion on personal health and economic growth to justify congestion and road usage charges.

Our suggestions for low cost measures to reduce car use build on the Smarter Travel programme:

- An information campaign to help private motorists price their transport costs, in our experience working with employees, most drivers never calculate the true costs and are shocked by their results when we help them do so.
  - Understanding your current cost of motoring is the first step to making informed choices around car sharing, modal shift and electric vehicles.
  - The Irish motor industry has already given readymade campaign examples from the UK to DTAS and SEAI to show what works.
  - AA Ireland offer a trusted source of data on this topic which deserves more coverage by Government: [http://www.theaa.ie/aa/motoring-advice/cost-of-motoring.aspx](http://www.theaa.ie/aa/motoring-advice/cost-of-motoring.aspx) (we have no affiliation with the AA).

- Tackle the mileage allowance culture with a flexible approach; checks on odometer matched mileage ensure owners drive needlessly to keep their mileage expenses high.
  - Divorce expensed mileage from the odometer: Allow companies pay the same allowance whether employees use the train, car share or cycle. There are apps galore to prove distance travelled; EV’s also benefit from reduced distances.

- As we suggested 16th February 2007 when the road tax regime was being redesigned, emissions tests will be gamed (see #Dieselgate 2015-17). The same will apply to new testing regimes once the rules are known. As transport is the movement of a given amount of mass from point A to point B: Tax all vehicles on their empty / unladen weight, use capacity or load factors where needed to highlight the efficiency of bikes, commercials, taxis and buses;
  - Where necessary e.g. in cities, give local government (via the NTA) powers to discount/incentive different forms of transport e.g. High Occupancy Vehicles, Shared Taxis, Park & Ride, Bicycles etc. to meet local needs at varying times of day and year.

On the driving for work topic alone, a co-ordinated approach by Revenue, the RSA and HSA could work wonders to reduce road deaths and emissions for budget 2018.
4. Should the Government consider early investment in the adoption of alternative fuels and technologies or delay investment until they advance further and become more cost efficient and cost-effective?

Since 2012 (Better Energy Workplace) Government funding has become increasingly bureaucratic, checks and balances are needed, but the pace of change in this sector is now such that no bureaucratic process can keep up.

The existing Accelerated Capital Allowances (ACA) scheme is underutilised by transport suppliers, it offers a proven method for suppliers and businesses in Ireland to be incentivised to invest.

Let the market decide: AEMS have a ready to go certification scheme to answer the requirements of a transport retrofit ACA scheme. We are sure others (e.g. SIMI members) would have similar.

Investing for modal shift

Ring fencing increased carbon tax from fuel for strategic transport projects e.g. DART underground, M50 car tolls, or high speed ferries to help bypass post-Brexit delays, would help business buy-in. However the current regime whereby only €18bn of the €38bn collected from transport is returned to transport does not inspire confidence or trust in the exchequer.

- Shift car journeys, electrify mainline rail; Edgar Morgenroth ESRI\(^1\) showed that the largest part of the population is closer to mainline rail services than to motorway junctions.
- Aircraft electrification, as a leading financier of aircraft and an island nation with Europe’s busiest air route, Ireland can lead in testing zero emissions aircraft (not forgetting drones etc.).

Establish trust in alternative fuels

Many alternative fuels are cheaper than diesel or petrol e.g. CNG or LPG. For those operators with the wherewithal to risk investing in new alternative fuelled commercial vehicles, government can:

- Prioritise clean burning gaseous fuels for transport in cities (CNG, LPG, BioCNG & BioLPG).
- Prioritise alternative fuels to operators certified to be operating energy efficiently

Government can identify which fuels deliver measurable emissions reduction and overall system efficiencies using existing instruments such as ACA, Triple E and/or NSAI (encourage local suppliers to get involved in Standards development, fund SME expenses to EU standards meetings).

\(^{1}\) See Edgar’s publication and analysis at [https://www.esri.ie/pubs/BKMNEXT278.pdf](https://www.esri.ie/pubs/BKMNEXT278.pdf)
5. What measures could businesses employ to accelerate the decarbonisation of the Irish freight sector?

Energy efficiency first

Public transport success in energy efficiency is mentioned in passing, but the means are not promoted i.e. a structured approach to fuel and energy management delivers results in bottom line profit, these lessons can be applied across the commercial vehicle and freight sector.

- Adopt Energy Efficiency as the first alternative fuel for commercial operators, ISO50001 is an internationally recognised route to improved energy performance and increased profit.
- Operators certified to ISO50001 have a clear picture of their energy use, opportunities to improve and improving operational skills, supporting investment in fuels and technologies.
- Recognise a green freight programme such as our own ECOfleet™ sponsored by Enprova under the EEOS, or help us bring an international programme to Ireland (North & South).
- It is critical for the credibility of any such scheme that it is performance based.

When equalising carbon taxes on diesel to reflect societal costs, use the opportunity to reward operators who are measurably improving fuel and emissions performance with tax breaks;

- Expand the diesel rebate scheme to report performance and/or outsource the measurement and verification of same.

Ecodriving

As promoters and trainers for the EU ecodriving programme since 2006, we welcome the clear policy direction on ecodriving, however the bureaucracy now associated with any form of government grant is likely to put off all but the very largest operators.

- With 80% of commercial transport operated by SMEs, Government should recognise a simpler scheme to help fund and/or incentivise ecodriving training; reporting results to Government.
- Such as scheme has been operating on a small scale since Enprova sponsored the EU Ecodriven project to come to Ireland in 2012, this programme remains open to all instructors who can deliver measured results.

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2 Upcoming changes to the Eurovignette directive are rumoured to let member states differentiate tolls on the basis of truck CO₂ emissions and aim to replace time-based charging with distance-based charging. This makes it imperative Irish operators move to efficient Euro VI vehicles operated as efficiently as possible, as soon as possible.
Declaration of interests

Authentic solutions limited trading as AEMS Authentic Energy Management Services are independent energy advisors and trainers, registered energy auditor in Ireland and UK. We:

- Work for several of the obligated parties under the SEAI EEOS programme
- Develop and deliver ECOdrive training since 2006, facilitating training of ecodriving instructors
- Develop and deliver ECOfleet™ fuel efficiency and green freight programmes since 2006
- Develop and deliver ISO50001 training for transport operators, 2011 to date
- Provide Measurement & Verification services to IPMVP and/or SEAI for EEOS, 2010 to date
- Have been asked to train transport energy auditors in the UK and EU, most recently in Malta

End notes

Expensed Mileage: recent changes to rates simply reinforce the use of larger more polluting cars, they represent a missed opportunity to incentivise switching to Electric Vehicle use and/or public transport. See new rates below, ask yourself the question what car should I choose to get maximum mileage allowance? Or which rate do I use for an EV?

<table>
<thead>
<tr>
<th>Distance Bands</th>
<th>Engine Capacity up to 12.00cc</th>
<th>Engine Capacity 1,301 cc to 1,500 cc</th>
<th>Engine Capacity 1,501 cc and over</th>
</tr>
</thead>
<tbody>
<tr>
<td>Band 1 0 - 1,500 km</td>
<td>37.95 cent</td>
<td>39.85 cent</td>
<td>44.79 cent</td>
</tr>
<tr>
<td>Band 2 1,501 - 5,000 km</td>
<td>70.50 cent</td>
<td>73.21 cent</td>
<td>83.53 cent</td>
</tr>
<tr>
<td>Band 3 5,001 - 15,000 km</td>
<td>27.15 cent</td>
<td>29.03 cent</td>
<td>32.21 cent</td>
</tr>
<tr>
<td>Band 4 15,001 km and over</td>
<td>21.36 cent</td>
<td>22.23 cent</td>
<td>25.85 cent</td>
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</tbody>
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Analysis shows you lose the most money on the largest cars, but the document does not highlight this nor specify which rate to use for Electric Vehicles, and continues to reinforce the ‘more miles = more money’ mindset.