



Response of the Road Haulage Association to the Department for Infrastructure.

“Incentivising cleaner fuel technologies: Implementing amendments to the General Circulation Directive and other associated proposals”.

09/01/2017

Background about the RHA

1. The RHA is the leading trade association representing road haulage and distribution companies, which operate HGVs as profit centres. Our 7,000 members, operating near to 100,000 HGVs, range from single-truck firms to those with thousands of vehicles. These companies provide essential services on which the people and businesses of the UK depend.
2. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, including training.
3. We would like to thank the Department for Infrastructure for the consultation and the opportunity to comment on the issues raised.

General Comments

4. The RHA and its members are active supporters of reducing emissions in the road haulage sector and climate change as a whole.
5. Some points of initial concern are;
 - a. The impact of an increased number of EVs on the National Grid.
 - b. The impact on Climate Change in generating considerably more electricity and hydrogen to meet the needs of the road haulage industry.
 - d. The vehicle downtime whilst charging at EV charging points.
 - e. Sufficient refuelling/charging points across the road network in Northern Ireland.
6. The Road Haulage Association believes that any weight increases permitted should also be extended to diesel efficient Euro VI engines. These vehicles are very environmentally friendly and are far more efficient and financially viable than alternatively fuelled vehicles. While we support efforts to promote the availability in the medium term of hybrid diesel/electric HGVs and vans that are financially viable, we would urge the Department to consider extending the weight increases to Euro VI HGVs.

Responses to the Questions

Question 1. Which option, 1 or 2, do you prefer? Please explain your answer.

7. Option 1 would give international hauliers a competitive advantage over domestic hauliers, the majority of whom we represent. Therefore we strongly believe that any permitted weight increase should be applied to both Domestic & International hauliers and so our preference would be Option 2.

Question 2. We welcome views from stakeholders with regard to the anticipated benefits and costs of the two options set out above. This should not include costs related to new vehicles or infrastructure. Please provide any details and any evidence on:

A) The anticipated costs and benefits (e.g. economic, environmental, congestion, safety) that transporting the Directive only (as set out in option 1) would bring.

B) The anticipated costs and benefits (e.g. economic, environmental, congestion, safety) would bring.

8. A) No comment.

B) The RHA has no evidence or comment to make on the associated running costs of operating alternatively fuelled vehicles as at this moment in time there is no haulier running vehicles on a large enough scale to draw a comparison to similar diesel run fleets. The RHA do have concerns over the wider costs operating a greater number of alternatively fuelled vehicles will have on the national grid. Currently alternatively fuelled vehicles are only capable of operating at lower weights and as such could potentially cause an increase to congestion in our cities.

Question 3. Please provide any evidence on the impact on fuel consumption and fleet running costs. So, for example, if a fleet switched from diesel to electric or gas vehicles.

9. The RHA has no comment to make on running costs. However, current evidence suggests that alternatively fuelled vehicles are more expensive to run, certainly at set up and so the cost is likely to be passed on to the consumer.

Question 4. How do you think there will be an impact on small firms?

10. A) No comment.

B) Although applying the weight increase to both domestic & international hauliers would create a level playing field, it is likely that smaller hauliers would struggle to find the capital investment needed to fund alternatively fuelled vehicles, particularly

hydrogen fuelled, and so are likely to be disadvantaged by other companies operating with a higher payload.

Question 5. How many haulage operators do you think will take advantage of extra weight allowances for vehicles with alternative fuel technologies?

11. A) No comment.
B) The RHA supports efforts to promote the availability in the medium term of hybrid diesel/electric HGVs and vans that are financially viable and believe that at such a time as these vehicles are available there will be a natural uptake of alternative fuel technologies, especially with the added incentive of extra weight allowances assuming the existence of infrastructure to support their vehicles.

Question 6. How many bus operators do you think will take advantage of extra weight allowances for 3 axle buses with alternative fuels technologies?

12. A) No comment.
B) No comment.

Question 7. How many bus operators do you think will take advantage of the extra weight allowance for 2 axle buses and use part of this extra weight allowance for alternative fuel technologies?

13. A) No comment.
B) No comment.

Question 8. Article 10f of the Directive states that a shipper must give a statement of weight to the haulier who is transporting their container or swap body. Do you believe that this is the best achieve as we have set out in Annex 4? If not, is there a better way of doing this?

14. Yes. No further comments.

Question 9. Do you believe there will be any monetised costs or benefits from this new provision?

15. Yes. A greater understanding and more transparent system in monitoring the weight of containers should safeguard against the risk of overweight vehicles and the potential of vehicle downtime & fines.

Question 10. Will formalising the Commission's clarification of the carriage of 45 foot containers (as set out in paragraph 1.15) bring about any monetised costs or benefits?

16. No. There is unlikely to be any monetary benefit to the industry.

Question 11. Will there be any costs or benefits from allowing the extra 2 tonnes in weight (from 40 tonnes to 42 tonnes) for articulated vehicles comprising a two-axle tractor unit drawing a three-axle semi-trailer as part of an intermodal transport operation?

17. The technology is currently not in wide enough use to allow us to draw any comparison. In order to measure this accurately we believe the weight allowances must be applied to Euro 6 diesel engines.

Question 12. What percentage of operators do you believe will use these provisions in question 11 for intermodal journeys?

18. It is difficult to comment on this, again because currently there is no technology in operation. The percentage of operators who use these provisions will be dependent on the cost of the technology, reliability and the supporting infrastructure across the road network.

Question 13. Do you agree with the proposed approach of amending the Construction and Use regulations to permit use of hydrogen, natural gas and biomethane fuelled vehicles that have been type approved to relevant EU gas fuel system safety standards?

19. Yes.

Question 14. What are the estimated benefits for users of these vehicles in administrative time saving through not having to apply for VSOs?

20. The administrative time saved through not having to apply for a VSO will be negligible.

Question 15. Should the Construction and Use amendments also remove the need for VSOs for post registration converted vehicles (provided the fuel system components have been approved to EU gas fuel system safety standards and installed correctly)?

21. Yes.



Final Comments

22. The Road Haulage Association welcomes any weight allowance increase for vehicles using alternative fuel technologies but strongly believes that any weight increase should be extended to diesel efficient Euro VI engines. These vehicles are very environmentally friendly and are far more efficient, reliable and financially viable than alternatively fuelled vehicles at this moment in time.

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