



Response of the Road Haulage Association to the public consultation on operators licencing exemptions

The Road Haulage Association (RHA) is the trade and employers organisation for the hire-and-reward sector of the road haulage industry. The RHA represents some 6,000 companies throughout the UK, with around 100,000 HGVs and with fleet size and driver numbers varying from one through to thousands.

We welcome and support the government's initiative and intention to review and amend the current exemptions list for HGV classes detailed within the current exemption listing, which are clearly goods operating vehicles and should be treated so on the grounds of a level business playing field and road safety.

The RHA has a number of recovery vehicle operators in membership so we have included with our response additional documents provided by them for your further reference, but it can be advised and confirmed that all RHA members are supportive of these proposed changes.

Consultation Questions

Q1. We fully support and agree with the requirement to review and amend the scope of these exemptions on the grounds that it can be demonstrated that these vehicles are standard commercial vehicle chassis/cabs, meeting all relevant requirements under C&U and European legislation relating to commercial vehicles. There are currently vehicles operating unfairly under the banner of engineering plant that are clearly gaining a commercial advantage whilst creating unfair competition issues. It could effectively be argued that if trucks look like commercial vehicles carrying goods for commercial gain then they are commercial vehicles and need to be subject to same rules and requirements.

Q2. The RHA believe that all vehicles based on a standard HGV chassis should be subject to operating licencing where they are involved in commercial activities. The degree and type of licensing for the heavy vehicles detailed in paragraph 2.13 of the consultation document should be considered on annual mileage and frequency of use; the exception to this would be the recovery industry which has developed in isolation to meet the needs of industry, the general public and essentially the economy.

Whilst the industry is supportive of the proposals there is a question that they would be unable to meet certain aspects of the licensing requirements without considerable cost being imposed on the industry and the UK economy. (Inc. documents TRS01-2012 & TRS02-2014.)



Q3. A review of the vehicles identified within Annex A to establish their actual function, coupled with their frequency of use and annual mileage may be a way of establishing if these vehicles/operations should fall under some form licensing obligation.

Q4. We are generally in agreement with the Impact Assessment, but do have reservations that the costs, particularly for the recovery industry could be substantially higher than those detailed in the impact assessment, based on the concerns highlighted in our response to question 2, particularly in relation to overnight vehicle parking.

Q5. The RHA would be happy to assist with further input and information going forward based on the points made in our response particularly regarding our concerns with the potential cost impact associated with the recovery industry – however we stress here that RHA recovery members are fully supportive of the proposal to introduce operator licencing requirements.

Ray Engley

A handwritten signature in black ink, appearing to read "Ray Engley", with a long horizontal stroke extending to the right.

Head of Technical Services

11th March 2015