

Tuesday, 20 September 2022

CallforEvidence@decc.gov.ie

RE: Call for Expert Evidence - Climate Action Plan 2023

To whom it may concern

We have provided feedback to consultations many times over the last few years, we are now too busy (thankfully) to respond in detail but are **happy to help brief any researchers** working on behalf of Dept of Transport or Department of the Environment, Climate and Communications on a pro bono basis, to help expand the evidence base for Climate Action Plans.

Summary topics for urgent further research:

- 1. Make last mile (and eventually all) delivery costs visible in all receipts and bills**
 - Precedent France Objectif CO2 2011 to date (barriers none, there is mature technology).
 - Benefits make main street collection attractive and reinforce bike & cargo ebike use
 - Outcome: Elimination of ' free deliver and returns
- 2. Circular economy; there's no point in eliminating single use coffee cups if we continue to buy heavier more polluting cars; heavier SUVs are now 50+% of new car sales**
 - **Move Motor Tax to Unladen Weight and/or price road tolls by weight of cars** (commercial vehicles are already taxed and priced by weight)
 - Barrier: Change laws to accept ANPR data in court, and collect tolls at source from wages / income / company taxes i.e. revamp of motor tax & road toll collection is needed now to automate future revenue collection
- 3. Improve HDV performance; by helping operators switch to electric HDVs - available now**
 - Barrier #1 is grid access: Prioritize grid works that reduce CO2 in Eirgrid/ESBN scheduling (barrier - new electricity demand takes precedence now due to primary legislation). There will be no AFHDV grants for electric HDVs without chargers.
 - Barrier #2 public perception; Highlight the benefits of one large (electric) heavily regulated truck over 10+ unregulated electric vans to promote ebikes for last mile (no driver shortage, less risk etc.)

Note we have already briefed the academic team working at CILT on barriers to sustainable freight in the planning and local government system, I am sure they will be submitting their findings separately.

[REDACTED]

Authentic solutions limited t/a

AEMS Authentic Energy Management Services

50-56 Merrion Road, Ballsbridge, Dublin 4

Registered in Ireland No 397388

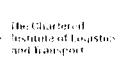
01 230 5018 or team@aems.ie

[REDACTED]

VAT No. IE 6417388H

www.aems.ie

Memberships:



Full disclosure

ECOfleet is trademark and service of authentic solutions limited since 2006, at various times we have worked with SEAI the national energy authority, IPIA members and other energy suppliers to deliver measured energy savings in L/100km and CO2e. In 2020 our partners include;



80 members participating
<https://www.ftai.ie/ecofleet>



IRHA Training led initiative in ecodriving for owner managers and drivers



ECOfleet was invited to join Smart Freight Centre and its Global Logistics Emissions Council expert panel in 2018



Trainer and developer IEA
<https://irishexporters.ie/sustainable-supply-chains-training-programme/>



The global professional body working for those in the logistics, transport and supply chain.



Formerly LowCVP (Carbon Vehicle Partnership) now ZEMO for zero emissions mobility
<https://www.zemo.org.uk/about-us.htm>

Climate Action evidence from ECOfleet programme

By way of evidence for climate action in freight we submit below results from the SEAI/EEOS regulated (signed off by Minister Eamonn Ryan) results in tonnes of CO2 avoided by FTAI & IRHA member companies 2014-2021 under the Enprova funded EEOS programme (more details at <https://aems.ie/blog/can-training-deliver-measured-ghg-savings/> if needed)

