
Public consultation on Moving Together: A Strategic Approach to the Improved Efficiency of the Transport System in Ireland

**Response from the American Chamber of Commerce Ireland
(AmCham) to the Department of Transport.**

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The American Chamber of Commerce Ireland The Voice of US-Ireland Business

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.

AmCham welcomes the opportunity to respond to the Department of Transport's consultation "*Moving Together: A Strategic Approach to the Improved Efficiency of the Transport System in Ireland.*" The transport sector represents 19.4% of Ireland's greenhouse gas emissions, and whilst other sectors decreased their emissions in 2022, transport saw an increase of 6%.¹ Significant changes to Ireland's transport system are therefore needed if carbon emissions are to be meaningfully reduced. AmCham acknowledges that demand management will play a role in this transition, and in this regard welcomes a number of the recommendations noted in the strategy. Centrally, however, the delivery of vital transport infrastructure and sustainable public transport solutions will be the core driver of emission reductions within the transport sector. Demand management measures cannot be expected or achieved without having the necessary alternative transport infrastructure in place. This should be taken into consideration in terms of the implementation of demand side measures.

Demand Management as a Strategy

As Ireland's population continues to grow, and as business needs advance, the delivery of necessary transport infrastructure will be essential in providing for Ireland's future business and community growth and achieving sustainability goals. AmCham members support decarbonisation measures: 42% of respondents in an AmCham members aim to be carbon neutral by 2030, with this rising to 64% of members by 2040. As the consultation document notes "*sustainability credentials are increasingly important in attracting foreign direct investment (FDI) and talent into the country*"², particularly in light of EU reporting requirements under the CSRD. AmCham would stress the need for greater attention to be placed on the delivery of infrastructure projects that will enable more sustainable travel and enhance regional development and connectivity, which is a key aim of the National Planning Framework. Demand reduction cannot be achieved without viable alternatives for people and for industry. Indeed, the consultation document notes, that "*this national approach to managing travel is currently unique*"³ and that there is "*there is no precedent or model against which we can benchmark success*"⁴ in terms of a standalone demand management strategy. Demand management and the delivery of more sustainable options go hand-in-hand and, as such, the need for a standalone demand management strategy could run the risk of creating confusion in relation to the

¹ EPA: <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/transport/>

² Department of Transport: <https://www.gov.ie/en/consultation/b51b0-moving-together-a-strategic-approach-to-the-improved-efficiency-of-the-transport-system-in-ireland/>

³ Ibid.

⁴ Ibid.

approach pursued by Government. Greater clarity must be provided in terms of how this strategy will interact with Government’s other initiatives, including the National Planning Framework, the National Development Plan, the Climate Action Plan, and several other strategies noted in the consultation document itself. There seems to be considerable overlap, and this creates challenges in relation to clarity on the interaction between the various different documents being produced by Government on the topic of transport.

Integrated Land-Use and Transport Planning

AmCham acknowledges the recommendations noted in this section of the strategy. AmCham would echo the need for integrated planning as noted in the strategy, and supports the goal that *“the planning of homes, jobs, recreation, education, and other activities and services is complementary to the planning of transport infrastructure and services required to connect these activities.”*⁵ The need for joined-up thinking will be crucial in planning for Ireland’s future and providing the necessary capacity to cater for future growth and investment.

Central to the timely progression of all critical infrastructure projects will be reform of the planning system. AmCham acknowledges the work undertaken within the Planning and Development Bill 2023 which aims to address some of the key challenges existing within the Irish planning system. However, increased action is necessary to deliver a planning system which can provide the necessary capacity for Ireland’s future growth. Developing a planning system which meets the needs of modern-day society and business is paramount. As we look to the future, ensuring the greatest degree of certainty in relation to timeframes for approvals, and the prioritisation of key infrastructure projects will be essential to ensure Ireland provides the clarity needed to secure new investments.

AmCham has stressed the importance of a concerted communications effort from Government when it comes to encouraging the behavioural change that will be necessary if Ireland is to reach its carbon reduction goals. Noting the work undertaken in relation to communications, a redoubled focus on a dedicated communication strategy, to the same level we witnessed with Covid-19 messaging, at both a local and national level is one way to facilitate the change in attitudes which will be essential to driving Ireland’s green transition. AmCham therefore welcomes the strategy’s commitment to *“information campaigns targeting attitudes to, and perceptions of, active travel and public transport.”*⁶ AmCham would emphasise the importance of behavioural change to

⁵ Ibid.

⁶ Ibid.

climate action. The Department must have a continued focus on consistent and clear messaging in this regard. Again however, the necessary sustainable transport options must be in place before individuals are able to make impactful behavioural changes. In this regard, AmCham acknowledges the strategy's note that "*providing conveniently located sustainable alternatives and increasing the availability of services at and between centres can enable behavioural changes in favour of sustainable transport modes and support the successful outcomes of integrated land use and transport measures.*"⁷ In enhancing Ireland's transport system, ensuring a focus on micro-mobility solutions, particularly for the first and last miles of a commuters' journey, will support the development of a transport system that is effective and efficient for individuals and families.

Fiscal Measures

Fiscal measures will be key in driving Ireland's transport demand strategy, as they will play a central role in encouraging behavioural change and in facilitating investment in greener transport solutions. In terms of penalties, it will be crucial that Government is mindful not to penalise without having necessary alternatives in place, and that the practicalities of business are taken into consideration. For example, deliveries cannot always be re-moded by public transport, and whilst E-bikes and E-walkers are solutions for more sustainable final mile solutions they cannot completely replace the traditional transport vehicles. In the same vein, express deliveries cannot be re-timed, given that certain deliveries are time sensitive. It is also important that multiple layers of charges on vehicle journeys are avoided. Government further needs to consider the unintended consequences of certain penalties. For example, the introduction of charges based on vehicle size could have an adverse effect on both congestion and emissions as they may lead to more smaller vehicles on the road.

In terms of the introduction of low, ultra-low, and zero emissions zones, it is important that there is country-wide consistency and alignment. There should be alignment across different zones in different cities/regions. For example, in the UK, if a city introduces a Clean Air zone there is minimum requirement of vehicle to be Euro VI – these should apply to all zones introduced. The introduction of different requirements, criteria, and payment systems, risks causing difficulty for companies who operate a nationwide fleet. AmCham further suggests that any charges applied should be used to support funding for the purchase of electric vehicles (EVs) and the infrastructure to support their use.

⁷ Ibid.

In terms changing fleets to EVs there are several challenges that need to be addressed. As it stands there is limited cost-effective EV availability, and a significant disparity in cost between most commercial EVs and diesel vehicles. In this context, it would be beneficial for the Department to review the measures currently in place to promote the availability of EVs and consider the introduction of additional supports for companies in transitioning to zero emission vehicles, both in terms of the purchase of vehicles and of the corresponding charging infrastructure. In this regard, AmCham notes the recommendation to “*consider the need for expanding the ZEHDV scheme to provide financial incentives for EV depot charging infrastructure to also encourage uptake.*”⁸

There are several incentives that could be introduced to encourage individuals to switch to greener forms of transport. For example, AmCham’s 2025 Budget-Submission called for the introduction of fare offerings on public transport to cater for those in a hybrid working environment, with 2- and 3-day pass options, and this is something that could be incorporated into the Department of Transport’s strategy. Currently, individuals have the option on some transport services of undertaking a single or return journey, or purchasing a weekly, monthly or annual ticket. However, the introduction of new offerings, where it is possible to buy a fare-saving 2- or 3-day pass, would make sustainable transport options more appealing to commuters and should be actively pursued.

Generators of Demand (Retail, Industry, and Freight)

AmCham appreciates the strategy’s acknowledgement that the planning and delivery of infrastructure is “*essential to the sustainable movement of goods around Ireland*”⁹ and agrees with the sentiment that the freight sector is often an “*afterthought*”¹⁰ and as such needs to be more fully incorporated into policy planning. It is also positive that the Department highlights that “*Ireland’s domestic and international road freight sector is an integral part of the economy.*”¹¹ As this is the case there is a need for more engagement at local and national level with the freight transport industry so that Government can better understand the challenges and opportunities presented by decarbonisation measures. For example, it is positive that the Department mentions the importance of “*consistent*

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

*communication*¹²in terms of any future measures that may impact deliveries, as collaboration will be key in understanding how to make deliveries more efficient.

AmCham agrees that there needs to be a “*a certain level of infrastructure provision*” to “*encourage hauliers to move to alternative fuels.*”¹³ The Department’s recent consultation on alternative fuels infrastructure for transport was welcome, and AmCham would encourage continued engagement between Government and industry on this issue. Industry requires assurance that the relevant infrastructure will be put in place to allow it to fully commit to transitioning to alternative fuels and advanced technology vehicles. Such assurances would support industry through providing certainty on the fuelling infrastructure that will be supported into the future, and, on this basis, clear direction is urgently needed. Industry requires the provision of certainty regarding the delivery of alternative fuel infrastructure, and clarity regarding timelines of this delivery, so that it can appropriately plan for the future.

AmCham would finally note the need for the delivery of adequate infrastructure to provide the capacity for sustainable growth at Dublin Airport, and the delivery of balanced air connectivity to support Ireland’s regional airports, including Cork, Donegal, Kerry, Knock and Shannon.

¹² Ibid.

¹³ Ibid.