



Ireland's Second Climate Action Plan

Submission to the Department of Transport

November 2020



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1. Introduction

This note is in response to a request on the 27th of November 2020 from Mr. Ken Spratt, Acting Secretary General of the Department of Transport, in which he asked the Coach Tourism and Transport Council of Ireland (the CTTC) to set out all the climate actions and measures it is taking, or has planned to take, in the immediate (next 6 months), medium (1-3 years) and longer term that will deliver emission reductions between now and 2030.

As the representative body for Ireland's coach touring companies and Ireland's private bus operators the Coach Tourism and Transport Council of Ireland (CTTC) welcomes the opportunity and is delighted to make this submission. The CTTC's members are experts in all types of coach hire and transport solutions, including: tours, conferencing, school transport, and the provision of scheduled commuter services throughout the country.

The submission is to feed in to the second iteration of Ireland's Climate Action Plan, which is scheduled for delivery in June 2021. The intention is that the revised plan will build on the Government's first plan, which was published in 2019, to reflect the step-up in ambition in climate action in Ireland and across the world.

The increase in ambition is reflected in the new coalition government's Programme for Government ("the Programme"), which states that *"we are committed to an average 7% per annum reduction in overall greenhouse gas emissions from 2021 to 2030 (a 51% reduction over the decade) and to achieving net zero emissions by 2050. Every sector will contribute to meeting this target by implementing policy changes as outlined throughout this Programme for Government."*

The government recognises that, with the increased scale and depth of this ambition, new strategies will be needed to achieve an average 7% per annum fall in emissions to 2030. It also recognises that the strategies to deliver these emissions reductions will require genuine consultation, detailed planning, organisation and adequate mechanisms for funding and incentives, as well as the gradual build-up of their impact.

As the transport sector is responsible for over 20% of Ireland's emissions, there can be no doubt that we have a vital role to play in the national emission reduction effort. Every element of the transport sector will be required to take decisive climate action. Collectively, the sector must identify and deliver a series of measures to achieve a 7% per annum emissions reduction.

According to the Department's own consultation publication "Sustainable Mobility Policy", published in November 2019, public transport (jointly buses, taxis and rail) emissions accounted for approximately 4.5% of all transport emissions, or just 1.2% of Ireland's overall emissions. The vast majority of emissions in the transport sector are from the private car. Reducing the impact of car emissions, and encouraging existing car users to switch mode to public transport, is therefore the key challenge to address if we are to achieve our emission targets.

This challenge comes at a time of an increasing requirement for transport. The next twenty years will see significant additional demand for transport in the country, for a number of reasons. Firstly, the population is predicted to increase by 1 million people. Secondly, there will be 600,000 extra jobs in the economy and thirdly it is expected that up to 500,000 more homes will be built in that period. To cater for the traffic movements generated by this growth will require significant additional investment in new transport infrastructure.

The conclusion to be drawn from the above is that it will not be an easy task to hit these emission targets, a fact which is accepted by the Government, who note in the Programme that *"it is vital that there is adequate time and effort devoted to working with communities and sectors in designing and delivering the pathway to achieve the goal in a fair way. This will mean creating fresh opportunities for those sectors, underpinned by the core philosophy of a Just Transition."*

The CTTC's members are committed to assisting the Department reach their emission targets. However, to do so will require assistance from government in a number of areas. These are discussed later in this submission.

2. Description of Climate Actions by the CTTC

We are on-board!

Our members are committed to using as environmentally-friendly a fleet as possible. Over half of the current fleet is less than 5 years old and is compliant with the EURO VI directive on emissions.

Our passengers are also fully supportive when it comes to the needs to tackle climate change. A survey of almost 800 passengers on privately operated services was carried out last year. Some key results to highlight from the survey are:

- Almost half of passengers could have made the journey by car but chose the bus.
- 80% want to see the government take action to extend bus lanes outside the capital.
- 96% of passengers have concerns about the climate crisis.
- 75% of passengers do not think the government is doing enough to address the crisis.

Each of our actions are described below and summarised in tabular form in Annex 1 and Annex 2.

Annex 1, Action 1 - Enhancing our fleet

The CTTC is committed to ensuring that our fleet is continuously upgraded. Our current fleet is made up vehicles which exceed all European emission targets. Our members spend over €80 million on new vehicles in each year.

We will continue to ensure our fleet conforms to all government standards. The introduction of zero-emission zones in town and cities across the country will necessitate a change to the average vehicle specification. For instance, current electric vehicles are inadequate for longer distance run from city centre to city centre and will thus not be suitable for use. Similarly, the likelihood is that EURO VI vehicles will not be sufficient to meet the new requirements and so alterations will have to be made to the bus and coach fleet in the country. We are aware of this and will work to ensure that we take on board the changing requirements.

But we cannot do this alone.

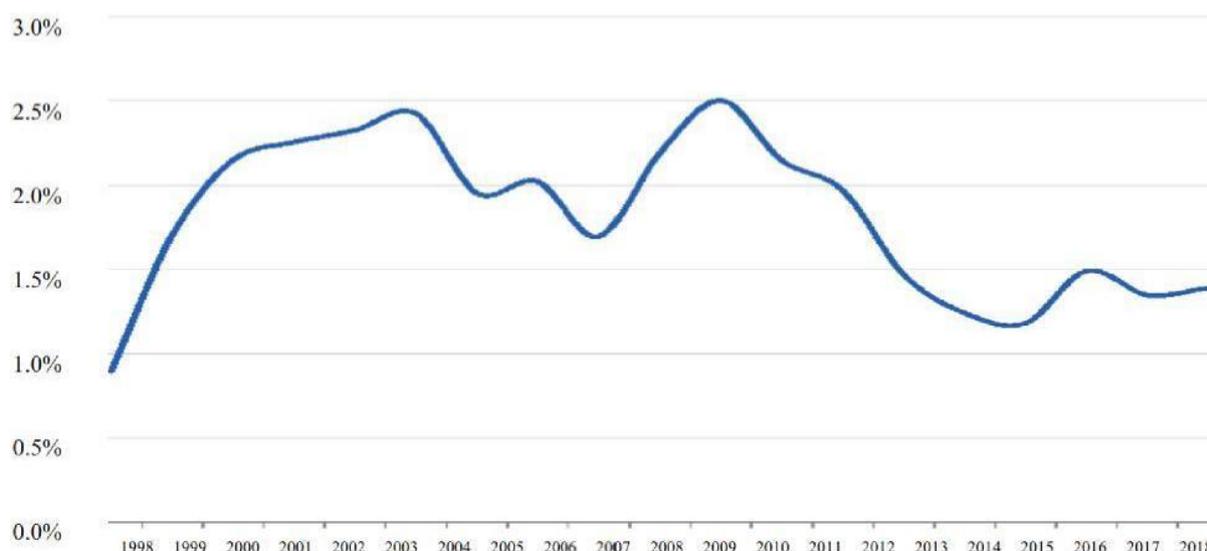
According to the Department's own consultation document "Sustainable Mobility Policy" the primary source of land transport emissions were from the private car sector (c. 52%), followed by the goods sector which accounted for 27.1% of emissions, and public transport which accounted for 4.5% of transport emissions, or just 1.2% of total emissions. Notwithstanding that, their view is that:

"Converting the public transport fleet to low carbon alternatives will have a limited mitigation impact on national emission levels of CO₂; however, it would undoubtedly fulfil a strong leadership and demonstrative role."

Such a change will not have a huge financial impact on Dublin Bus and Bus Éireann, since the cost of these changes will be met out of public funds.

However, they will have a huge impact on the private operator. At a time when expenditure on public transport is at the lowest level, percentage wise, in over two decades (see Figure 1 below), it is now time for the government to introduce subsidies to allow private operators to purchase newer environmentally-friendly vehicles.

Figure 1: Public transport expenditure as % of total Exchequer spend, 1998-2018



Consideration must also be given as to how to encourage private operators (either through tax reduction schemes or subsidy incentives) to move to a lower emission regime.

Annex 1, Action 2 - Reducing the Carbon footprint of the CTTC

Since the advent of the COVID-19 pandemic the CTTC has reviewed the way it operates as an organisation. As a result of this review, there will be a significant move away from physical meetings and seminars to virtual, online meetings and seminars, post-pandemic. This will lead to an improvement in our organisation’s carbon footprint. In addition, we encourage all of our publications to be read electronically, thus reducing our need for printing and consumables.

Annex 2, Action 1 - Encourage more people out of their cars and on to public transport

If actions are taken to reduce car traffic, then there will be a decrease in emissions, journey time and congestion. The table below¹ shows results of the analysis undertaken to calculate the peak period impact of a reduction in car traffic of 10% in Dublin.

Table 1: Impact of a 10% reduction of peak period car traffic in Dublin

	10% Decrease
Reduction in Number of Cars	5,800 cars
Increase in Loading of Average Bus	3.4 people
Reduction in CO2	14,500 tonne
Reduction in NOx	20 tonne
Average Journey Time Reduction	8 minutes
Saving in Congestion Cost	€91m

1: From the NTA Canal Cordon data, augmented by own our analysis.

A reduction of 10% would mean that there would be almost 6,000 fewer cars on the roads in the peak periods, increasing loadings on the average bus by just 3 passengers. In addition, the reduction in cars would cut urban emissions, reduce journey times and lead to a saving in congestion costs.

Public transport will rise to the challenge of providing additional buses and services to meet growing public transport demand. But their efforts must be matched by government agencies.

Firstly, the government must invest in new express bus lanes on Motorways, more inner city bus lanes, new bus priority lanes, city centre parking facilities, accessible bus stops and stations, dedicated park and rides and servicing facilities to provide alternative fuel for greener vehicles.

Government action on the above will, in turn, lead to investment by the private sector. The end result will be an improvement in the frequency of services, reducing journey times, and increasing the number of buses available for the public private transport system. This will lead to a modal shift to public transport and in turn a reduction in carbon emissions and traffic congestion.

To help achieve this, we believe that in the first instance the Public Transport Task Force should be initiated. This should have an independent chair and its own budget and be made up of all key organisations involved in public transport. The Task Force should advise on how to re-start the industry with social distancing measures and advise on post-COVID-19 transport changes, particularly in relation to infrastructure provision, active transport and the climate crisis.

Annex 2, Action 2 -Encourage more people to switch from domestic air travel to public transport

More road improvements could help to encourage domestic air passengers away from environmentally-polluting air transport and on to public transport. As an example of the impact of road improvements, consider what happened after the completion of the Galway to Dublin Motorway. Once finished, it led to a decline in the use of Galway airport, as passenger switched to new and fast bus services to access Dublin airport from Galway.

In the year to October 2017 51,000 people flew between Farranfore, Co Kerry, and Dublin airport and the Letterkenny-based Donegal airport saw 33,516 passengers flying to Dublin. The implementation of proposed road improvements such as the €300 million upgrade of 34km of the N21 (the Adare bypass), and the A5 upgrade through Northern Ireland, as well as a continued investment on other interurban roads and motorways, will mean that public transport can attract more of these domestic air passengers onto our more environmentally-friendly mode of transport.

Annex 2, Action 3 - Enhance the School Transport Scheme ("the STS")

An independent and comprehensive review of the school transport scheme could lead to significant additional environmental benefits. The system has changed little since the commencement of the STS, apart from some minor changes to catchment area boundaries. A review could be used to improve both the overall effectiveness of the STS and also to increase the number of students participating on the STS. The impact of this would be an overall reduction in the cost per seat.

From discussions within the sector, it is believed that a review of the school catchment system could lead to a 10% increase in patronage on the current buses. This equates to 12,000 schoolchildren. Such an increase in patronage would reduce the number of cars on the road by at least 6,000 vehicles in the morning peak period (assuming 2 schoolchildren per car), leading to a significant improvement in congestion and vehicle emissions. Apart from saving parents a significant amount of time, this would also help to meet Ireland's emission targets.

The review should also consider the issue of local link services. In some situations, particularly in sparsely populated areas, these local link services could be adapted so that they can deliver school bus services as part of their remit. In addition, these local link services currently set up under the Rural Transport System should be extended to provide “collect and connect services” to the main public transport and commercial services currently operating on our motorways. In doing so a greater level of cost effectiveness would be achieved, allowing for further investment in new services and in new infrastructure.

Annex 2, Action 4 – Support the Creation of a Climate Research & Action Group

The CTTC will support the creation of a Climate Research & Action Group. The purpose of this Group will be to review current developments in relation to public transport and the environment, in particular, concerning emission levels and environmental improvements being introduced worldwide.

It is suggested that this Group should be set up initially by the Department of Transport, with representatives invited from across the sector, including operators, civil and public servants and academics with an interest and knowledge in the issue.

Annex 1: Climate Actions committed to by the CTTC

Action 1 - Enhancing our fleet		
Steps necessary for delivery	Proposed Output (e.g. pilot study, research paper, legislation, communication campaign etc.)	Proposed Timeline (timeline for each step)
Reopening of Ireland post-COVID	A return to stable passenger numbers	Ongoing
Improved payments to coach operators	Payments from Bus Éireann and from coach operators which reflect the need for the operator to renew their fleet	Ongoing
Recognition by Government Bus Éireann of the need to ensure the school bus fleet is renewed	The School Transport Scheme tender assessment process should move away from a "race to the bottom" and recognise that investment is needed to ensure the fleet is up-to-date.	Ongoing
Financial support from government	Government must provide additional subsidies for new vehicles, as they do to Bus Éireann and Dublin Bus, where new vehicles are provided for free.	Ongoing

Action 2 - Reducing the Carbon footprint of the CTTC		
Steps necessary for delivery	Proposed Output (e.g. pilot study, research paper, legislation, communication campaign etc.)	Proposed Timeline (timeline for each step)
Decision by Executive Board to hold more virtual meetings	Reduction in the actual number of physical meetings.	Ongoing
Decision by Council and Members to approve Board decision	Reduction in the actual number of physical meetings.	Ongoing
Place more of the CTTC submissions and documentation on the website	Reduced need for members and / or others to print out documentation, reducing consumables.	Ongoing

Annex 2: Additional Climate Actions the CTTC intends to take to help tackle climate change

Action 1 - Encourage more people out of their cars and on to public transport				
Steps necessary for delivery	Proposed Output (e.g. pilot study, research paper, legislation, communication campaign etc.)	Proposed Timeline (timeline for each step)	Estimated Greenhouse Gas reductions	Climate Resilience (does this action improve climate resilience)
Government to deliver on new infrastructure, such as motorway bus lanes, bus priority measures etc.	Expenditure on infrastructure	0-5 years	Significant	Yes
Private operators must increase the frequency of their services	Extra services	0-5 years	Significant	Yes
New Public Transport Task Force required to jointly progress these initiatives	Better communication within sector	Immediate	Significant	Yes
NTA must ensure easy to administer process for the introduction of new services	Easier processes for approval	Ongoing	Significant	Yes

Action 2 - Encourage more people to switch from domestic air travel to public transport				
Steps necessary for delivery	Proposed Output (e.g. pilot study, research paper, legislation, communication campaign etc.)	Proposed Timeline (timeline for each step)	Estimated Greenhouse Gas reductions	Climate Resilience (does this action improve climate resilience)
Additional expenditure on Motorway and road network	Faster journey times by road	0-5 years	Moderate	Yes
Increased frequency of bus services	More availability of faster services	0-5 years	Moderate	Yes

Action 3 - Enhance the School Transport Scheme (STS)				
Steps necessary for delivery	Proposed Output (e.g. pilot study, research paper, legislation, communication campaign etc.)	Proposed Timeline (timeline for each step)	Estimated Greenhouse Gas reductions	Climate Resilience (improve climate resilience?)
A comprehensive review of the school catchment areas	Research paper	0-6 months	Potentially significant	Yes
Assessment of how local link services could be used to augment the current STS	Research paper	0-6 months	Potentially significant	Yes
New Advisory Body for the STS, with members from across the sector	Better communication within the sector. Better working relationships between the various players.	0-6 months	Potentially significant	Yes
Communication across the sector to identify where linkages could be made to enhance and expand current service provision	Communication campaign	Ongoing	Potentially significant	Yes

Action 4 - Support the Creation of a Climate Research & Action Group				
Steps necessary for delivery	Proposed Output	Proposed Timeline	Estimated Greenhouse Gas reductions	Climate Resilience?
D of T sets up a Climate Research & Action Group	Meetings held	0-3 months	-	Yes
Agreement and Buy-in from operators and others (civil servants / academics etc.) to participate	Research paper of current developments	3-12 months	Potentially significant	Yes