

Response from

Chartered Institute of Logistics and Transport in Ireland (CILTI)

to Consultation Paper Number 4 from Commission for Taxi Regulation

1. Background

1.1 The Chartered Institute of Logistics and Transport in Ireland (CILTI) is the independent professional body for those involved in logistics, air, rail, road and sea transport. It currently has a membership of over 1,000. The Institute's qualifications are recognised worldwide as proof of a high level of professionalism in the industry. The Institute in Ireland maintains close links with the International Institute, which has a membership of about 31,000 logistics and transport professionals throughout the world.

1.2 CILTI is pleased to take this opportunity to provide its response to Consultation Paper Number 4, issued by the Commission for Taxi Regulation, in relation to Vehicle Standards for **Small Public Service Vehicles (SPSV)**^[1]. The Institute recognises the importance of having in place vehicle standards for SPSVs that will apply throughout the country. It is important that any new standards that are introduced have the objective of improving the quality of service, comfort and safety of all passengers and drivers.

1.3 In making its Response, this Institute takes a broad policy perspective regarding the proposals for vehicle standards. It is a matter for those engaged in the sector to raise specific technical and practical issues on the proposals for vehicle standards^[2]. Given that the most significant impacts are likely to be felt by users, it is critical that views of user groups be given particular attention by the Commission for Taxi Regulation.

2. Phased Introduction

2.1 Considerable reforms are being proposed by the Commission for Taxi Regulation in this Consultation Paper. They would apply across a wide range of areas in relation to vehicle standards within the SPSV sector. In these circumstances, the Institute would strongly support the view that, following this consultation process, such reforms should only be put in

place on a phased basis. Moreover, any new standards should certainly be allowed to co-exist with the existing standards, for a period of time, in order to allow for a smooth transition and enable service providers to modify or change their vehicles, where necessary, over a reasonable period of time.

2.2 In making the foregoing comments, the Institute believes that the main focus of policy development for taxi services should be to ensure that the quality of service to the customer is improved and that safety considerations are always to the fore.

3. Safety

3.1 The matter of safety is one that the Institute believes is especially important. In this regard, it notes that the law as it relates to seat belts and child restraints in all vehicles (including SPSVs) is a matter for the Minister for Transport. Specifically, Minister Martin Cullen made regulations last year entitled the European Communities (Compulsory Use of Safety Belts and Child Restraint Systems in Motor Vehicles) Regulations 2006 (S.I. No. 240 of 2006)[\[3\]](#). However, an exemption has been granted for SPSVs in relation to EC legislation that requires appropriate child restraint systems for the carriage of children in the rear of SPSVs. This exemption applies where an appropriate child restraint system is not available.

3.2 The Institute believes that it is important that the Commission should share the findings and suggestions arising from this consultation process for Taxi Regulation with both the Minister for Transport and the Road Safety Authority. Moreover, the Commission for Taxi Regulation should further engage with the Minister for Transport, the Road Safety Authority and the Industry to explore possible solutions to this complex issue.

4. Vehicle Standards and Wheelchair Accessible Taxis

4.1 The CILTI recognises that making improvements in the accessibility of taxis and hackneys for people with mobility, sensory and cognitive impairments remains a particular challenge. While the Commission for Taxi Regulation points out that there are currently four categories of SPSV licences, namely taxi, wheelchair accessible taxi, hackney and limousine, it

does propose to add a new licence category of wheelchair accessible hackney.

4.2 In considering vehicle standards for wheelchair accessible taxis/hackneys, it is important that the Department of Transport's Sectoral Plan for Accessible Transport, under the Disability Act 2005, is taken fully into account[4]. In particular, the Plan recognises that "*Taxis and hackneys have a key role to play in the provision of a door-to-door service for people with mobility, sensory and cognitive impairments. For many people they provide the only means by which they can participate in economic, social or cultural activity*". The Plan goes on to point out that there are two issues of concern in relation to availability of SPSVs for people with mobility, sensory and cognitive impairments. Firstly, there is the issue of the number of accessible vehicles which are licensed. Secondly, there is the issue of ensuring that vehicles, which are licensed as accessible, actually provide the service. While these issues do not relate specifically to the current consultation being undertaken by the Commission for Taxi Regulation, the Institute believe that it is important to raise them in its Response, as having acceptable standards is not sufficient, if there are insufficient wheelchair or fully accessible vehicles to meet demand.

4.3 The Commission's own research indicates that the initial purchase cost of a wheelchair or fully accessible vehicle is proving a serious disincentive to providing such a service. The Institute is aware that solutions to this problem are being explored. In short, the solution lies in the provision of a financial incentive; one suggested solution could be in the form of VRT relief on accessible SPSVs. As a follow-up, it is very important that the Commission for Taxi Regulation makes arrangements to have sufficient enforcement officers to ensure that those with wheelchair accessible licences actually provide the service.

5. General Implementation

5.1 The setting of standards and other rules for the taxi sector is a necessary, but not a sufficient condition. Obviously a key task in the regulation of the market is to undertake regular qualitative and quantitative surveys of taxi/hackney operations. This is crucial to ensure

up-to-date assessment of the quality and level of service offered by the taxi industry. The implementation of improvements in the service necessarily requires regular up-to-date statistical measurement of the “state of the taxi service”. Otherwise decisions will not be evidence-based.

6. Conclusion

6.1 The Institute welcomes this particular consultation initiative. In undertaking consultation, the Institute believes that the Commission for Taxi Regulation is contributing in general to an increase to the accountability and transparency of the process of examining proposals for improving the sector. Such consultation can help to ensure that debates on standards and regulations are based on shared understanding, sound evidence and structured information. This is particularly so if it results in improved levels of service (and safety) to the population as a whole. Finally, the Institute would like to acknowledge that the Commission has achieved much to date for Taxi Regulation. We wish the Commission well in achieving its current targets.

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[1] The Institute notes that, for **Small Public Service Vehicles (SPSV)**, the Commission for Taxi Regulation refers collectively to taxis, wheelchair accessible taxis, hackneys and limousines. They are defined as vehicles capable of carrying a maximum of eight passengers in addition to the driver

[2] The Institute recognises that this embraces a wide range of actors, including industry associations and other representative groups, taxi operators, holders of taxi, wheelchair accessible taxi, hackney and limousine vehicle licences and licensed SPSV drivers. It also includes those who wish to use SPSVs, in addition to vehicle manufacturers and distributors.

[3] The Regulations extend the requirements in relation to the wearing of safety belts and child restraints by occupants of motor vehicles. In particular, the Regulations afford children greater protection when travelling in motor vehicles. The Regulations implement Directive 2003/20/EC relating to the compulsory wearing of safety belts and child restraint systems in motor vehicles.

[4] This Plan was published in July 2006 and it sets out the proposals of the Minister for Transport and the agencies under his aegis in relation to the rolling out over the next number of years of a comprehensive programme of accessible transport for people with mobility, sensory and cognitive impairments, together with older people.