

# KNIGHTS OF THE ROAD



NOVEMBER 2014 Issue 13

NEWSLETTER OF THE IRISH ROAD HAULAGE ASSOCIATION

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## Meeting with Government on Road Tax

Further to the protest action which the Association held in Dublin Port on the 20th of October to highlight the strangling effect the cost of commercial vehicle road tax is having on the hire and reward haulage sector, a delegation from the Irish Road Haulage Association met with Minister Noonan and Minister Donohoe in the Department of Finance on the 10th of November. The Association outlined to the two Ministers the various changes which must be introduced in order to allow the indigenous hire and reward haulage operator to compete with an out-of-state vehicle. Both Minister Noonan and Minister Donohoe stated that they acknowledge and appreciate the efforts of the IRHA to represent the interests of its members and to identify to Government the needs of the sector in order for Government to support accordingly.



Dublin Port Tunnel



Protests

Minister Donohoe stated that the IRHA has been very effective in communicating the main elements of concern relating to road tax which are creating difficulties for the industry; namely the current road tax structure, the HGV levy in NI and the issue of southern vehicles 're-flagging' to other jurisdictions in order to provide for their commercial survival. As a direct result of the IRHA's lobby, and in order to support the hire and reward sector, Minister Donohoe stated that the inter-departmental working group report, originally scheduled to be published in the first quarter of next year, has been fast tracked and therefore will be completed by Friday the 14th of November. Thereafter there will be a two week period for the Minister to consider the content before it is put out for a brief period of consultation. Following that process, the feedback received will be submitted to Minister Noonan for decision.

*"Minister Donohoe stated that the IRHA has been very effective in communicating"*

In terms of the change to commercial vehicle road tax which will be made in the short term, the IRHA has long endorsed that the costing / figures should involve a straight rate cut to provide a competitive operating environment. In addition, a change from unladen weight to GVW will facilitate ease of enforcement at ground level. Minister Donohoe and Minister Noonan agreed that the referenced changes were the most effective way to support the hire and reward sector and therefore it is these changes they will seek to implement.

Minister Noonan made it very clear that the Government can and will work with the IRHA to address this matter and to which the Association accepted the offer of co-operation. Minister Noonan also stated that he supported the IRHA's proposal for a fuel rebate for the industry by implementing the Associations

proposed system. Therefore Minister Noonan gave the IRHA his word and personal commitment that he will reduce road tax in next year's budget, as well as introducing a change to GVW. In response, the Association agreed to work with Government over the coming period to assist in bringing about this change.



*Minister Michael Noonan*

Finally, as part of the co-operation with the IRHA on road tax going forward, the Department of Finance and Department of Transport issued a press release and a copy of that statement can be viewed on the IRHA website – [www.irha.ie](http://www.irha.ie)

## Minister Donohoe Meeting

The Association held a meeting with the new Minister for Transport Mr Paschal Donohoe TD on the 2nd of September. As the recognised representative body for licensed road haulage operators in Ireland, the Minister had been anxious to meet with the IRHA at the very beginning of his tenure in order to address the needs of the sector.

Minister Donohoe commenced proceedings by stating that he recognised the importance of the role the industry plays in the overall economy. Furthermore he stated that important role was acknowledged through the provision of the essential user fuel rebate by the current Government which the IRHA successfully lobbied for.

During the course of discussions on the day, the IRHA made representation on commercial vehicle road tax, vehicle weights, enforcement on out-of-state operators and agricultural tractors and trailers.

On commercial vehicle road tax, the Minister was reminded of the IRHA's proposal which includes the need to move from unladen weight to Gross Vehicle Weight (GVW), while simultaneously providing a substantial reduction on monetary rates applicable to the heaviest commercial vehicles.

In addition, the IRHA's ultimate goal of seeking the introduction of a 'pay-as-you-go' road user charge was discussed at length. The Minister was informed that the changeover to GVW, coupled with a reduction in the various monetary rates, must be reduced in order to allow the national fleet to compete with out-of-state vehicles operating within Ireland, while this in turn will stem the 'reflagging' of haulage vehicles to other jurisdictions, primarily Northern Ireland.

The Minister stated that he was in no doubt as to the gravity of the situation and thus the urgency of the industry predicament which was very clearly conveyed to him by the IRHA delegation. As a result, the Minister committed to doing everything within his power to bring about support for the sector on road tax within the budgetary cycle.

On vehicle weights, while a detailed note is included in this edition, it is worth mentioning that the Association was



*Minister Paschal Donohoe*

heartened by the Minister's open mindedness to revisit the proposal of the IRHA where we are seeking 42 tonne on five axle vehicles permanently, an increase in GVW for the four axle rigid to 35 tonne and extend the provision to allow the six axle draw bar trailer to operate at 46 tonne. Following discussions with the Minister, the Association is hopeful of a favourable result on all three combinations.

As regard agricultural tractors, the IRHA was informed that on the morning of our meeting, the Minister had just signed legislation which clearly identified where agricultural vehicles are permitted to be used on the public road. Again, the Association was pleased to be informed that its efforts to see an enforcement approach based on 'AHF' had been adopted and signed into legislation by the Department of Transport.

The IRHA had proposed that a policy of AHF was implemented - Agriculture, Horticulture, Forestry - as it would greatly facilitate efficient enforcement as any agricultural vehicle found on the public road engaged in activity outside of the 'AHF' sector would be in breach of the law.

Finally, as regard enforcement on out-of-state vehicles Minister Donohoe stated that he will raise the Associations concerns with the RSA board and seek to progress the matter from that point.

In summary, the IRHA was very pleased following its first meeting with Minister Donohoe. It was very clear during the course of discussions that the Minister has a very good grasp of his brief and appeared to be very genuine and sincere in his desire to facilitate operational improvements within the sector.

The IRHA looks forward to further enhancing its relationship with the Minister and the numerous very helpful officials within the Department of Transport.

## Road User Levy - NI

*IRHA head-office has been informed that enforcement of the UK HGV levy will be starting in Northern Ireland as of Monday the 17th of November.*

It has been a requirement to pay the levy before using a HGV over 12 tonnes on roads in Great Britain and Northern Ireland since the 1st of April 2014. However until now the Driver and Vehicle Agency has not had the power to enforce the levy in NI. On the 4th of November, the Northern Ireland Assembly confirmed the necessary legislation and the DVA will now begin using these powers. They will check for levy compliance at the roadside along with their existing road safety compliance activities. Where a vehicle is found not to have a valid levy for that day, a financial penalty will be issued. This will be for £300 and the vehicle will be held until it is paid.

It is possible to pay the levy on-line as well as availing of nine pay points across Ireland. The system automatically calculates the most cost effective way of paying the levy. For vehicles travelling regularly into Northern Ireland, it will usually be the most cost effective way to pay for an annual levy. **It is also possible for a driver to check on-line that a levy has been paid for the vehicle he is driving by entering the licence plate number of the drawing vehicle.**

The levy amount varies by type of vehicle, number of axles and maximum plated weight. Please note that it is not the unladen weight, used for tax purposes in Ireland rather it is the weight per axle, since this reflects the damage caused to the road.

## Vehicle Weights

Members who are operating five axle articulated vehicles (two plus three) will be aware that the current derogation to allow such vehicles to operate at 42 tonne is due to end as of the 31st of December this year. **The IRHA is objecting to this derogation ending** and therefore we are lobbying to allow the five axle combination (two plus three) at 42 tonne to be signed into legislation permanently for a number of very valid reasons.

As of January 2013 road haulage vehicles with more than four axles are permitted to operate with a gross vehicle weight between 40 and 44 tonnes on French national roads. This authorisation is applicable to every type of goods transport with no restrictions in place.

This development within the territory of France has been very helpful in allowing Irish registered vehicles to operate with a greater degree of efficiency in respect of the transportation of agricultural product and fish produce which can be legally transported at 42 tonne on five axles out of Rosslare and into Normandy and Brittany.

In addition, the current provision of 42 tonne on five axles in Ireland has worked very well to date and more importantly it has allowed haulage companies who are utilising such a combination to access agricultural and construction sites countrywide in a safe manner. Furthermore, if the five axle combination reverts to 40 tonne as scheduled later this year, it will result in a six tonne differential between the five and six axle vehicle which will not meet the ground level needs of the licensed haulage industry and the respective sectors they are serving.

During the course of the meeting with Minister for Transport Paschal Donohoe (outlined earlier) on the 2nd of September this matter was discussed at length. Following that discussion the Minister requested further detail as to the current permitted GVW on five axle vehicles throughout Europe and the Association has met that Ministerial request and provided a detailed analysis.

At the time of going to print, the IRHA is awaiting a decision from Minister Donohoe on this matter. However the Minister has committed to meeting with the Association again before the Christmas break in order to relay his decision on this subject matter.

The Association will provide members with an update as soon as further information is forthcoming.

On a related subject matter, extensive efforts are continuing to provide for six axle draw bar trailers to operate at 46 tonne and it is hoped that this combination will be permitted at 46 tonne early in the New Year. Efforts are also continuing to provide for the four axle rigid vehicle to operate at 35 tonne.

Finally, in respect of the five axle rigid combination which was recently presented to the market, the IRHA is objecting to the provision at 39 tonne and therefore we are seeking a reduced GVW of 35 tonne on the five axle rigid, coupled with increasing the four axle rigid to 35 tonne, to allow both combinations to be competitive on a level playing field.

An update on each of the combinations referenced above will be provided to members at the earliest opportunity.

## Agricultural Tractors & Trailers

*Members of the Association will be aware that*

*the IRHA has been lobbying for many years to implement legislation which would restrict agricultural tractors from engaging in hire and reward haulage work.*

While this matter is not a countrywide problem, there are pockets of the country where our members have suffered at the hands of agricultural tractors taking hire and reward haulage work from licensed haulage operators. Such a scenario was intolerable from the perspective of the hire and reward haulage industry and therefore had to be addressed.

Following our extensive lobbying efforts, we were pleased to learn that the former Minister for Transport Leo Varadkar TD signed legislation which implemented the IRHA's proposal of enforcement based on 'AHF' - Agriculture, Horticulture and Forestry. A copy of the legislation detailing the various restrictions that will be in place on agricultural tractors as of the 1st of January 2016 can be sourced from IRHA head-office.

## Type Approval Requirements – Reminder

As of the 29th of October 2014, type approval was extended to completed (multi-stage build) vehicles of category N2 and N3 (heavy commercial vehicles) and special purpose vehicles of N1, N2, N3, M2, M3, O1, O2, O3 and O4.

What this all means is that as of the 29th of October 2014 all new vehicles (including trailers) will require type approval certification in order to be sold or registered in Ireland or any EU Member State. Further information on this subject matter can be obtained from IRHA head-office.

## Guidelines Regarding the Verified Gross Mass of a Cargo Container

In May 2014, the Maritime Safety Committee considered the proposal by the Sub-Committee on Dangerous Goods, Solid Cargoes and Containers and subsequently approved the Guidelines regarding the verified gross mass of a container carrying cargo. The Guidelines are intended to establish a common approach for the implementation and enforcement of the International Convention for the Safety of Life at Sea (SOLAS) requirements regarding the verification of the gross mass of packed containers.



The Guidelines precisely specify that the responsibility for obtaining and documenting the verified gross mass of a packed container lies with the shipper (consignor). SOLAS regulations prescribe two methods by which the shipper may obtain the verified gross mass of a packed container:

1. Upon the conclusion of packing and sealing a container, the shipper may weigh, or arrange that a third party weighs, the packed container; and
2. The shipper (or, by arrangement of the shipper, a third party), may weigh all packages and cargo items.

SOLAS regulations require the shipper to verify the gross mass of the packed container using Method No.1 or Method No.2 and to communicate the verified gross mass in a shipping document.

The SOLAS requirements regarding



verified gross mass of a container carrying cargo (SOLAS regulation VI/2) are expected to enter into force in July 2016

## Euro Tachograph Solutions

A Corporate Partner of the IRHA, Euro Tachograph Solutions, have kindly provided a guidance note for members in respect of moving on and off a ferry. It provides practical advice on how to utilise your tachograph settings while remaining legally compliant with the driver's hour's rules.

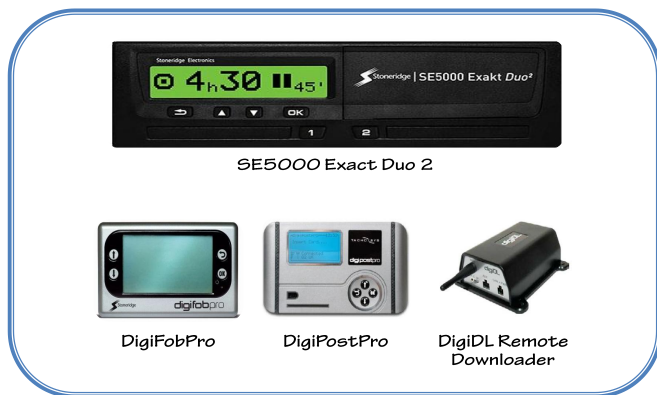
Members are urged to consider Euro Tachograph Solutions for all of their tachograph and compliance needs where Alan Nugent is ready and willing to assist. If you wish to discuss the available service or the content of the included guidance note, please do not hesitate to contact Alan on 087 953 3318



Attention all IRHA members

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## Moving on & off a Ferry

Firstly, there is no such thing as ferry mode. The modes available on a tachograph unit are

1. Driving – which unless you have a really old one you cannot select manually
2. 'Other Work'
3. POA
4. Break/Rest

Secondly, you only use the Ferry Option if the crossing will be part of your daily Rest period otherwise you just use the tachograph as normal.



If it will be part of your daily rest, you will arrive in the port and book on and then join the lane to wait for boarding and put your tachograph on Rest, and go into the menu and set the end country to where you are. Just before you board go into the menu and select the ferry option, this will mark the data with the reason you are interrupting your Rest period.

When you move to board, the mode will change to driving automatically. Once on-board select Rest mode again. When you come to disembark, if you have completed your 11 hour rest period go into menu and set begin country to wherever you are and change mode to 'Other Work'.

If you will be completing your rest once ashore then go into the menu and select the ferry option, again it will mark the data with the reason you are interrupting your rest. Disembark and when parked up change the mode to Rest. When you have completed your rest set begin country to wherever you are and change mode to 'Other Work'.

That's it! The ferry option is the digital equivalent of writing on the back of a chart the reason for interrupting your rest and should only be used if a driver is using the ferry crossing as part of their daily rest.

## Germany - Fuel in 'non-standard' Tanks

During the course of last year members were informed of the German Customs' practice of imposing an energy tax on fuel purchased in another EU Member State and carried in so-called "non-standard tanks" which resulted in cases of double taxation, hauliers having to pay the energy tax in Germany in addition to the excise duties already paid at the pump in the Member State of purchase.

This practice was based on the interpretation by the German Customs of Article 24 of the EU Energy Taxation Directive which allows vehicles that refuel in one EU Member State to enter other Member States without having to pay further fuel taxes, as long as the vehicles concerned are fitted with "standard tanks". "Standard tanks" are defined in the Directive as "tanks fixed by the manufacturer". German Customs regarded all tanks not fitted by the manufacturer as part of the initial production fit as "non-standard".

In the framework of a dispute between a German haulage operator and the German Customs regarding the energy tax, the German Federal Finance Court referred to the European Court of Justice for a preliminary ruling concerning the interpretation of the notion of "standard tank".

On the 10th of September, the European Court of Justice finally gave its preliminary ruling and said that:

"The term 'standard tanks', referred to in the first indent of Article 24(2) of Council Directive 2003/96/EC [...] must be interpreted as not excluding tanks fixed permanently to commercial motor vehicles intended for the direct supply of fuel to those vehicles when the tanks have been fitted by a person other than the manufacturer [...]"

To justify its position, the Court of Justice considered that:

1. In the current economic and technical context it is common for commercial vehicles to be manufactured in several phases, with the manufacturer producing only the chassis and the cab whilst the rest is then fitted out by specialist undertakings. The same principle applies to fuel tanks.
2. The exemption from excise duty in a Member State of fuel released for consumption in another Member State and contained in the tanks of commercial vehicles is granted 'in order not to impede free movement of individuals and goods and in order to prevent double taxation'.

It is not necessary to ascertain whether the fuel tank has been permanently fixed to the vehicle concerned by the manufacturer or by a third party. It is necessary on the other hand to ascertain whether that tank is used to supply the vehicle directly with fuel for the purpose of its propulsion and, where appropriate, for the operation of its refrigeration systems or its other systems.

This preliminary ruling by the Court of Justice of the EU will have two main consequences:

Once the interpretation of Article 24 is confirmed by the German Federal Finance Court, it will prevent German Customs from imposing the energy tax on fuel purchased in another Member State and contained in tanks fitted by parties other than the manufacturer.

This interpretation of Article 24 by the Court of Justice of the EU will effectively prevent all EU Member States who might have been tempted to do so following the German example, from imposing taxes on fuel purchased in another Member State and contained in tanks fitted by parties other than the manufacturer.

Until the preliminary ruling of the Court of Justice of the EU is confirmed by the German Federal Finance Court, members are advised to continue to carry documents on-board including the vehicle registration document, certificate of roadworthiness, manufacturer declaration, etc. to prove that tanks not fitted by the manufacturer comply with the manufacturer's specifications and the applicable technical and safety requirements.

## RSA Meeting

The Association met with the Road Safety Authority in early November to progress a number of matters of concern to the industry.

While the matter of vehicle weights is detailed earlier in this publication, this subject matter was discussed during the course of our meeting where the Association reiterated its call to allow the 42 tonne on five axle articulated vehicles to continue as a permanent measure as of next year. The final decision in this respect now rests with the Minister for Transport.

The IRHA also raised concerns with the 39 tonne five axle rigid vehicle which has made its way into the market place of recent times. While a decision on this combination rests with the Minister for Transport, the Association made it clear that we object to the current provision which is adversely affecting the four axle rigid combination. Representations will continue in this respect.

In terms of the difficulties experienced by members since the introduction of the revised testing regime, the IRHA was

informed that the review process which the Association lobbied for will commence in January where we will address concerns relating to the period of validity of the test certificate and ultimately we will be seeking twelve months validity from the date of the test. Feedback on this particular element will be provided as soon as the review process commences.

As part of the vehicle maintenance schedule and vehicle maintenance records that are now a legal requirement for every licensed operator to maintain, there will be an additional requirement as of next year to make an on-line declaration to the RSA in terms of your maintenance schedule. In this respect members are advised that an on-line declaration is the only option available to operators as there will be no provision to post in the details and therefore meet your legal requirement.

Finally, in respect to enforcement on out-of-state vehicles, the RSA have at the behest of the Association, issued two summonses to out-of-state operators for a breach of the driver's hours. It will be interesting to see how the case is dealt with as the cases taken are essentially acting as a test bed to establish if a far greater number of summonses can be issued to out-of-state vehicles going forward.

Any developments which may be forthcoming on the above elements will be shared with members as they become available.

## Pilot Trial of CNG in HGVs

The National Technology Centre for Biorefining & Bioenergy (TCBB) is at present preparing a proposal for the TEN-T/Connecting Europe Fund's Call for Proposals to undertake a pilot trial for a Compressed Natural Gas (CNG) refuelling corridor between Ireland and UK via Belfast and including Dublin, Cork and Limerick which will incorporate deployment of several open access CNG refuelling points.

This initiative coincides with Budget 2015 setting Excise Duty for CNG as a transport fuel at the minimum level permitted by the EU Energy Taxation Directive, 0.10 per cubic metre, and guaranteed at that level for 8 years. That's 0.40/litre of diesel equivalent less than the tax on diesel or petrol.

The TCBB's interest in this derives from the fact that the deployment of CNG refuelling infrastructure and a fleet of CNG vehicles which will enable many biogas - from waste plants to supply cleaned and upgraded biomethane to the grid or directly to vehicles as part of a viable, indigenous, renewable transport fuel industry which will not be reliant on subsidies.

The infrastructure will initially dispense CNG but over time the percentage of biomethane in the fuel will be increased as more biogas plants with gas upgrading equipment are developed. For any member who wishes to explore this opportunity, further details can be obtained from Owenroe Lemass on 091 49 5361.

## Drivers CPC

Members will be aware that the first five year period of drivers CPC periodic training for professional drivers was completed as of the 9th of September.

While the vast majority of drivers within the sector will have completed one training module per year over the last five years, there are still a number of drivers who are behind in meeting their legal requirement.



For any driver who has not completed their five modules and wishes to 'catch up' accordingly, notification in writing must be provided to the CPC unit of the RSA.

In that written communication, the driver must outline the reason why the five modules were not completed in the stipulated time frame.

A drivers CPC card cannot be applied for and granted until all five modules have been completed so if a driver cannot obtain a CPC card then they are open to significant potential fines if detected at a roadside checkpoint.

The penalties that exist are not for failing to complete the mandatory periodic training but rather for driving without being in possession of a drivers CPC card (€1000) and driving without holding a drivers CPC (€2000) - they are two separate offences and a driver may fall foul of both at one time as those professional drivers who cannot produce their CPC will be committing an offence. There is also a €5000 penalty for operators who knowingly employ a professional driver who does not hold a CPC.

*"Finally, I am aware of one of my members who received a £500 fine in the UK since the 9th of September for not being in a position to produce a CPC card, therefore enforcement is actively taking place in that jurisdiction."*

There has been much discussion about exemptions which may be availed of in order to avoid not having to undertake the periodic training. What is most concerning is the degree of misinformation which exists within the industry in this respect. In order to keep matters simple, the exemptions apply to the driving activity rather than the driver, so being a director of a company, sole trader etc. has no relevance on your requirement to conduct CPC training. Essentially if you are getting paid for driving a commercial vehicle over 3.5 tonne, even where it is only a small part of your overall role, the periodic training is required.

The list of available exemptions are the driving of a vehicle which:

- has a maximum authorised speed not exceeding 45 kilometres per hour
- is used by, or under the control of the Garda Síochána, the Defence Forces, a fire brigade, Irish Prison Service or the Civil Defence
- is undergoing road tests for technical development, repair or maintenance purposes
- is new or rebuilt and has not yet been put into service
- is used in a state of emergency or in rescue missions
- is used by a person in the course of a driving lesson or a driving test for the purposes of obtaining a driving licence or a CPC
- is used for the carriage of passengers or goods for personal use and not for commercial purposes or
- is carrying material or equipment for use by the driver in the course of his or her work, provided that the driving of the vehicle is not the driver's principal activity or occupation.

Finally, I am aware of one of my members who received a £500 fine in the UK since the 9th of September for not being in a position to produce a CPC card, therefore enforcement is

actively taking place in that jurisdiction.

Members and their drivers who have not completed their periodic training requirement are urged to heed the above advice in order to avoid significant financial penalties from the relevant enforcement authorities.

## Fuel Rebate - Fuel Cards

In respect of the essential user fuel rebate which the IRHA successfully lobbied for on behalf of the hire and reward haulage sector, I wish to provide a point of clarity in order to make the claims process clear for members submitting their details to Revenue.

With regard to purchasing fuel using a fuel card, there is no requirement for diesel cards to be vehicle specific. However a fuel card can be driver specific which would allow a driver to use his pre-approved fuel card to fill whatever vehicle he is driving as it requires diesel.

To make the claim on that fuel card there must be a trail of supporting evidence showing that the drawings went into a qualifying vehicle. Therefore members are advised to submit the vehicle registration and odometer reading at the respective service station when making the purchase.

Almost all fuel cards allow such details to be input at the point of sale so it would be highly advisable that members avail of this provision in order to avoid delays in Revenue processing your fuel rebate claim where the fuel purchases were made via a pre-approved fuel card.

## AIB - IRHA Corporate Partner

The IRHA is delighted to announce that AIB have joined the Association as a Corporate Partner.



AIB have been a long standing supporter of the Association for many years and their decision to formally partner with the IRHA via our Preferred Supplier Programme is very welcome.

We look forward to continuing our constructive working relationship with AIB over the coming twelve months.

## Department of Transport - Electronic Payments

The 19th of September 2014 was designated 'e-day' under the National Payments Plan which seeks to reduce the cost of Ireland's payment system through the increased use of more efficient payment methods that will ultimately lead to increased competitiveness and efficiency.

Therefore from the 19th of September 2014 the public sector will no longer issue cheques to business users or accept cheques from business users. As a result, the road transport operating unit in Loughrea will only accept payment by electronic means from the 19th of September.

Payments can be made by debit or credit card on-line at [www.rtol.ie](http://www.rtol.ie), by phone when you contact the unit or in person at the public office. Alternatively application forms will have a detachable page for entering card details that is then shredded when the transaction is completed.

## RSA - Levy Waiver for Trailers

Following the successful lobby by the IRHA that resulted in the lifting for six months of the road safety levy on the testing of trailers, members are reminded that this relief period expired as of 7th of October.

Any trailer tested from the 8th of October 2013 to the 20th of March 2014 which was subject to the CVR levy will benefit from the levy being waived at the next annual test of the trailer concerned provided it is tested no later than the relevant test date due.

For clarity, any trailers undergoing an annual test after the 7th of October 2014 will be subject to the CVR levy of €35.65 in addition to the normal test fee.

## Waste Collection Permits - International Waste Facilities

Many waste collectors are involved in the collection of waste for export either directly from the producer of the waste or from a waste processing facility where many have facilities outside the Republic of Ireland listed on their permits. Following representations by the IRHA, the National Waste Collection Permit Office (NWCPO) has amended the current policy to alleviate the administrative burden on the sector, while maintaining regulatory controls for the purposes of waste traceability and data reporting.

This new policy provides that:

- Permit holders will no longer be required to include the names of international facilities on waste collection permits.
- Ports of export will be included on relevant permits rather than end destination facilities.
- Facilities in Northern Ireland shall continue to be required to be included in appendix B in order to assist proper enforcement in the border counties.
- Annual returns can be made in 2015 detailing the port as the destination facility. The country of destination will however be required so the permit holder must include this information in their documentation system throughout the year in preparation of the annual return.
- The transport of waste by a haulier to the port for export is subject to the provisions of Regulation (EC) 1013/2006 on shipments of waste, and the Waste Management (Shipments of Waste) Regulations, 2007.
- Hauliers must be authorised to collect and transport the waste specified in a TFS notification or described in an Annex VII document to the port.
- Waste shipments start from the time the waste consignment is transported by the haulier from the waste facility or site of origin to the port and must be accompanied by the TFS documents.
- The notifier shall provide to the NTFSO i) details of the carrier nominated in the notification, ii) evidence that the carrier is authorised to collect the specified waste types, and iii) evidence that the carrier is authorised to transport the waste to the port of export indicated in the notification.

To add ports of export to your waste collection permit a pro-forma document must be completed by the permit holder and notifier or broker of the waste. The pro-forma must be submitted with the appropriate amendment fee. Existing international facilities can be removed in the same transaction by detailing them in the amendment email or cover letter as the case may be.

## HGV Awareness Campaign

The IRHA has again this year teamed up with An Garda Síochána to run a number of road safety campaigns in respect of HGVs in the city centre and their interaction with pedestrians and cyclists.

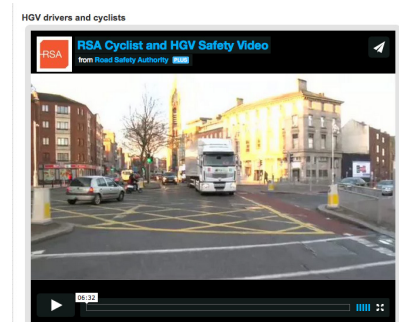
Therefore as part of the initiative the IRHA will be providing a HGV which will park up in pre-arranged locations where the Gardaí will invite passers-by to sit into the truck and get a sense of the view available to the driver when travelling in a city environment.

The campaign will be spear headed by Denis Sherwin, IRHA Dublin Branch Chairman, and representing C & G Logistics, where C & G will kindly provide a tractor unit.

There are six events in total planned in Dublin City Centre and the surrounding suburbs.

*I would like to take this opportunity to thank An Garda Síochána for initiating this road safety campaign and also a word of sincere thanks to Denis Sherwin, Chairman of the Dublin branch of the Association, for giving up his personal time to support this very worthy road safety effort.*

Finally, a word of thanks to Mike McKillen of Trinity College for his support and notification of the event to Cyclist.ie and to the Dublin Cycling Campaign; the support of which is critical to the success of the campaign.



IRHA Corporate Partners

