



12 April 2021

Ms Michelle McIlveen MLA

Chairperson

Committee for Infrastructure

Dear Michelle

Thank you for the opportunity to contribute to the Decarbonisation of Road Transport in Northern Ireland inquiry

As the largest private taxi operator on the island of Ireland, fonaCAB has a commitment to lead the market by considering and implementing new ideas and technologies and the move to a low / zero emission transport sector is an area which particularly interests us as a company.

As requested, we have also forwarded your invitation to other taxi operators and asked that they contribute to the inquiry. If they choose to do so they will make any return to your department directly. The following response reflects only our views at fonaCAB.

We have summarised our answers in bullet format and are happy to expand upon these if so desired.

Kind regards

William McCausland

Managing Director



What are the main challenges to the uptake of ULEV?

- Charging infrastructure
 - There are too few public charging points available
 - Existing charging points are often damaged / out of operation with no regular maintenance.
 - Existing charging points are often too slow / low powered to maximise the charging abilities of current EV and as a result charging times are much greater than should be achievable
 - Public mindset is that charging is a lengthy “hassle” compounded by the anxiety of not being able to find a working charger
 - Costs involved in installing a fast / rapid charger at home / place of work are high
 - Practical considerations for installation of home chargers where the property does not lend itself to this – for example, no driveway, no on street parking space, living in multiple occupation buildings
 - Confusion over electricity tariffs suitable for EV charging
- Poor availability of low emission fuels such as Hydrotreated Vegetable Oil (HVO) diesel
- Higher costs of low emission fuels when compared to standard alternatives (HVO 30% premium over standard diesel)
- Higher purchase price for an EV than for an ICE vehicle even when grants are accounted for
- Limited availability of used / nearly new EV
- Range anxiety
 - Lack of confidence that an EV will provide a sufficient usable range (made worse because of poor charging infrastructure)
 - Worries that the cooler climate in Northern Ireland will affect the manufacturers quoted ranges negatively (colder temperatures result in decreased range)
- Owners’ financial commitment to their current ICE vehicles and the costs / losses incurred when disposing of same when changing to EV
- Long term environmental benefits yet to be proven – better efficiency offset by environmental concerns around battery production
- Long term reliability and resale values unknown (lifespan and replacement costs of vehicle batteries as an example)
- Manufacturers currently producing EV vehicles which are less practical for taxiing than current ICE models (for example, focus on technology rather than accessibility, speed rather than range, innovation rather than affordability. Most EV models comparatively poor in comparison to existing ICE platforms on cabin and storage space
- Potential mistrust of associated technologies - for example, self-driving autonomous vehicles making driving jobs redundant
- Potential gradual battery degradation and the costs associated with replacement





What are the main benefits to the uptake of ULEV?

- Potentially lower ongoing / running costs
 - Lower cost of electricity compared to fossil fuels
 - Lower vehicle maintenance repair costs (EV requires for example less replacement of friction parts such as brake pads) with longer intervals between servicing
 - Currently lower vehicle excise duty / benefit in kind taxes when compared to many ICE alternatives
- With fewer moving parts than an ICE vehicle an EV should prove more reliable
- Zero emissions with an improvement in air quality, specifically in urban areas
- Lower vehicle noise levels
- Imbues a mindset more amenable to other green / environmental initiatives in users

What support to assist a move to ULEV would you like to see from the NI Executive?

Initiatives should seek to address the aforementioned challenges. Specific support / action should include

- A published commitment that private vehicle ownership will remain and will continue to be supported through transition to ULEV. Similar funding and emphasis given to private vehicle users as to public transport, cycling or other modes of transport
 - ULEV Public transport may offer benefits as a hub to hub solution but smaller vehicles (including taxis) will always be required for hub to spoke, spoke to spoke journeys and routes / times when public transport cannot or will not operate.
- A published binding commitment to ensure the charging network is developed and appropriately maintained with clear responsibilities, funding and accountable KPI's
- Government buildings / departments to lead by example
 - Installation of an adequate number of high speed charging points
 - Public sector staff and / or elected officials to use ULEV for official journeys
- A requirement that, and an incentive for, petrol retailers to install and maintain high speed charging points (to help the transition from fossil fuels while EV charging is not cost effective for them)
- Provision of high speed charging points on street (for example for those users who do not have driveways)
- Revision of planning regulations to allow for quicker installation of charging points
- Better coordination between Government departments, local councils, and private sector organisations for easier installation of charging points
- A public information campaign to demystify ULEV (Apps to use, tariffs to be on, different types of chargers etc)
- Financial support for businesses to install charging infrastructure on their own premises and incentivise their staff for using them
- Penalties for EV overstays at charging stations and for ICE vehicles using EV parking / charging spaces (causing denial of service)
- ICE vehicles scrappage scheme for private and business vehicle owners
- Extended BIK and VED incentives when transitioning to ULEV
- Financial support / tax incentives for vehicle retail businesses to allow them to stock ULEV vehicles for sale or for lease





- Consideration of interim measures to provide quick, cost effective “wins”
 - Financial incentives for transitioning to hybrid petrol electric vehicles
 - Subsidies for moving from diesel to HVO (immediate CO2 reduction in existing diesel vehicles)
- Consider implementing charging hubs similar to those already seen in some cities across the UK. Benefits include quick installation

Do you believe there should be official targets for your sector and have you any views on the potential timescale this could take?

In order to answer “yes” to this question, the challenges identified in the first question would have to be addressed and many of the initiatives mentioned in the previous question implemented

fonaCAB see the benefits that a ULEV future could bring environmentally and economically but are concerned that sector driven targets without the necessary public commitment and investment would be impossible to achieve and especially within the desired timeframes

Have you begun to plan for decarbonising your fleet and if so, could you provide some detail on this?

Yes, with a mixture of success and failure

- Previous attempts to introduce EV to our Fleet were unsuccessful because of the challenges already mentioned, but specifically
 - Lack of suitable working charging infrastructure
 - High cost of vehicles
 - Range anxiety and poor range of available EV models
 - Available EV models not practical for use as a taxi (e.g., Limited cabin space)
- We have worked with other interested parties (NIEVO / other large UK taxi depots) who have substantial technological knowledge and experience in order to learn from their findings
- We offer our drivers a range of petrol / hybrid vehicles that they can choose to drive instead of ICE alternatives and have stocked EV and hybrid vehicles for sale through the retail sales side of our business

Have you estimated the cost of decarbonising your fleet?

This is a difficult task considering that no one size will fit all (for example, some drivers have saloons, others large multi seaters or wheelchair adapted vehicles) and with many drivers currently committed to late model ICE vehicles this would require a gradual measured transition. A rough estimate however of 1000 vehicles purchased at an estimated cost of £30,000 per vehicle would equate to £30,000,000

In addition to vehicle purchase, we would estimate at least 6 – 7 high speed charging hubs to service our fleet at an estimated cost of around £750,000 per hub

In total, this would be an estimated implementation cost of around £35,000,000

