



Sheila Mawhinney  
Room 373  
Parliament Buildings  
Ballymiscaw  
Stormont  
Belfast  
BT4 3XX

30 July 2014

Dear Sheila,

**CONSULTATION ON THE ROAD TRAFFIC (AMENDMENT) BILL**

Many thanks for allowing us the opportunity to respond to the above consultation.

The Freight Transport Association (FTA) is one of the UK's largest trade associations and represents over 14,000 companies relying on or providing transport integration both domestically and internationally, to or from the UK. Our members include hauliers, freight forwarders, rail, sea and air freight operators, through to customers – producers, manufacturers, wholesalers and retailers. They cover all modes of transport – road, rail, air and sea. FTA members operate over 200,000 commercial goods vehicles on the roads in the UK; approximately half of the UK fleet. FTA members also consign around 90 per cent of goods moved by rail and around 70 per cent of goods moved by air and sea.

We welcome any changes to legislation that will help improve road safety and the proposed new lower drink drive limits of 50mg of alcohol in 100ml of blood for a non-specified person and 20mg of alcohol in 100ml of blood for a specified person should act as an added deterrent to any drivers considering consumption of alcohol prior to driving.

However we would like to make some points and seek further clarification on the matter of 'specified persons'. The prescribed limit for a 'Specified Person' will be 20mg of alcohol in 100ml of blood. This will mean that a person deemed a Vocational driver holding a driving licence category C, C1, D, D1, C+E, C1+E, D+E, D1+E or F will be treated differently compared to licence holders A, B and B1 who will be permitted a higher alcohol limit in their blood of 50mg per 100ml.

The question that FTA and our members would like clarified is, if a Vocational licence holder, e.g. a lorry driver holding a C1 licence, is stopped at a check-point but is not driving a vehicle over 3,5000kgs but instead their own private car which a B licence is only required for, will they have to comply with the lower 20mg level or will the higher 50mg level of alcohol in 100ml of blood apply? I.e. will the drink drive limit be based on the category of the vehicle being driven rather than category of licence at the time of detection?

**NORTHERN IRELAND**

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FREIGHT TRANSPORT ASSOCIATION



Local members of the FTA have raised concerns that the proposed new lower drink drive limits would be discriminatory against Vocational drivers and that there should be no difference between licence categories. For example a van driver on a category B licence will be subject to the higher drink drive limit of 50mg alcohol per 100ml blood but within the same organisation another employee who drives a 5,000kg vehicle on their category C licence would be subject to the lower 20mg level. Members feel that the definition of a professional driver should be clarified with regards to the proposed Road Traffic (Amendment) Bill and that any drivers of vehicles for work or professional use should be considered for inclusion in the 'Specified Person' category.

Employers of vocational licence holders (Specified Persons) will also have to address the issue of residual alcohol levels in the morning should a driver have alcohol the night before therefore the FTA would ask that concise advice and guidance is provided for both these employers and employees.

I trust that you find our response and subsequent comments of use and that you give it some consideration in the consultation. Should you require further clarification or oral evidence to the Committee then I will be pleased to assist further.

Yours Sincerely,

SEAMUS LEHENY

Policy & Membership Relations Manager - Northern Ireland

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