



National Transport Authority

SPSV Public Consultation: Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020

Analysis and Reporting

KPMG

December 2020

This report contains 13 pages



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations
2020 - Analysis and Reporting

Important Notice

This document is provided solely for the benefit of National Transport Authority (the Authority / NTA) and is not to be copied, quoted or referred to in whole or in part without KPMG's prior written consent. KPMG accepts no responsibility to anyone other than the NTA for the information contained therein. In preparing this document KPMG has relied upon and assumed, without independent verification, the accuracy and completeness of any information provided to us, and KPMG accepts no liability or makes no representation or warranty, express or implied, as to the accuracy, reasonableness or completeness of the information contained herein.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations
2020 - Analysis and Reporting

Contents

Important Notice	i
1 Introduction	3
1.1 NTA and Regulation	3
1.2 Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020	3
1.3 Other Consultation	4
1.4 Structure of this Report	4
2 Consultation Processes	5
2.1 Consultation Process	5
2.2 Approach to the Consultation Analysis	5
3 Consultation Findings	7
3.1 Introduction	7
3.2 Overall Opinion	7
3.3 Additional Commentary	7
3.4 Key Themes from All Respondents	7
3.5 Key Themes – Respondents who Agreed	8
3.6 Key Themes – Disagreed	9
3.7 Summary	10
Appendix 1 – NTA Website	11



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020 - Analysis and Reporting

1 Introduction

1.1 NTA and Regulation

The National Transport Authority (NTA) is the transport authority for the Greater Dublin Area and the public transport licensing agency for Ireland.

As part of its public transport licensing role, the NTA is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland.

As part of this regulatory function, and in accordance with Section 7, *Licensing regulations*, of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in relation to the fees charged in respect of applications for licences and other matters relating to licences.

Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specifies the fees payable in respect of the renewal of an SPSV licence for both six and twelve month licence periods. The annual SPSV licence renewal fee currently stands at €150 for non-wheelchair accessible vehicles and €75 for wheelchair accessible vehicles, however licences held in respect of vehicles which have reached their 10th anniversary of initial registration, must be renewed every six months at pro-rata rates.

Other fees include late renewal fees and fees associated with SPSV inspections.

1.2 Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020

In October 2020, in his 2021 Budget speech the Minister for Transport specified that funding would be made available to NTA to waive standard vehicle licence renewal fees for the calendar year 2021. The intention of the 2021 renewal fee waiver is to keep operators attached to the industry through financial assistance, coupled with regulatory, technical and health guidance provided. This is in response to the Covid-19 pandemic which has impacted significantly on the SPSV industry and to retain a supply of SPSVs for the travelling public nationwide in the future.

In response to this, the NTA has proposed the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020, the purpose of which is to give effect to the renewal fee waiver by temporarily amending the renewal fees referenced in Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 through a standalone, time bound clause for the calendar year 2021.

The amendment is intended to be made as an exceptional provision and emergency measure resultant from the COVID-19 pandemic, noting that public transport, specifically including small public service vehicles, is deemed by Government an essential service.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020 - Analysis and Reporting

The terms and conditions applicable to SPSV inspections including those governing cancellations and no-shows, will also be amended in light of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020.

NTA temporarily waived late renewal fees (up to €500) from 28 March 2020 to 31 March 2021. NTA has extended this temporary late renewal fees waiver to 12 June 2021. After this date, a reduced late renewal fee will be payable in respect of renewing an expired SPSV licence until 31 December 2021. Thereafter, SPSV licensing fees will revert to those set out in the Taxi Regulation (Small Public Service Vehicle) Regulations 2015.

SPSV licences must be renewed within 12 months of the licence entering an expired status.

As at October 2020, the SPSV fleet comprised 22,020 taxis, hackneys and limousines in active and inactive licence status (i.e. eligible to be renewed).

The NTA has undertaken public consultation to determine the SPSV industry's response to the proposed amendments.

1.3 Other Consultation

In addition, the NTA has proposed a further exceptional COVID-19 provision, the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (2) Regulation 2020, in relation to maximum permissible age limits. This would temporarily amend Regulation 31 of the Taxi Regulation (Small Public Service Vehicle) Regulations 2015, Maximum Permissible Age Requirements, up to and including 31 December 2021. This proposed provision is also subject to a separate public consultation exercise.

This report is focused on the findings from the consultation on the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020 only.

1.4 Structure of this Report

The structure of this report is as follows:

- Section 2 outlines the consultation process and the approach to the review and analysis of submissions.
- Section 3 outlines the key findings from the public consultation.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020 - Analysis and Reporting

2 Consultation Processes

2.1 Consultation Process

The NTA undertook industry consultation via an online survey published on its website. The online survey contained four response fields:

1. Name
2. Email address
3. Opinion: this was in the form of a two option drop-down menu:
 - I agree with the Draft Regulation.
 - I disagree with the Draft Regulation.
4. Other comments (which was a free-text field, restricted to 300 words).

Appendix 1 contains the details provided by the NTA on its website regarding the public consultation. The consultation ran from 20th October 2020 to 12th November 2020.

2.2 Approach to the Consultation Analysis

An MS excel file containing all responses to the public consultation was downloaded from the consultation site and the following three activities were undertaken:

1. Data cleansing

Data cleansing was undertaken to remove duplicate submissions and test submissions made by the NTA. Test submissions were highlighted by the NTA.

Duplicate submissions were identified where personal details (i.e. name and email address) matched.

The following approach was taken for duplicates:

- Matching opinion and matching comments from the same respondent – one record was removed.
- Matching opinion and more than one comment from the same respondent – comments were amalgamated to create one response and one record was removed.
- Mismatched opinion (with or without comments) from the same respondent – both records were retained as it was not possible to infer the intended opinion.

This resulted in an MS excel file containing 729 responses for coding and analysis.

2. Development of Themes

- An initial analysis was undertaken of a random sample of 100 submissions to identify the common themes emerging from the free-text comments.
- These themes were subsequently discussed and agreed with the NTA.
- The Table below sets out the themes applied to respondents' free-text comments.

Nil	No response was provided in the free-text field.
Agreed	Reiteration of agreement and/or appreciation of the proposed changes.
General Comment	A general comment usually regarding the precarious state of the taxi industry and/or personal circumstances and/or personal details.
Other Considerations	Other areas for consideration to support the taxi industry.
Maximum Permissible Age	Specific comments on the Maximum Permissible Age for taxis.
Waivers	Views on the proposed waivers.

3. Data coding

- All records were given a Unique Identifier.
- All submissions were read, interpreted and coded against the pre-agreed thematic coding frame.
- In a small number of cases, respondents' comments contained more than one theme and all themes were coded.
- Reasonable endeavours were made to ensure consistency in the application of themes including a quality review of a sample of coded responses. However, it is noted that while most respondents were fairly clear in presenting their views, some submissions did contain a degree of ambiguity.

Notes on the Data

The following should be considered in relation to the findings contained in this report:

- Consultation findings are the comments and views of respondents and their factual accuracy cannot be verified.
- Percentages will sum to more than 100 for all thematic analysis as respondents' submissions could contain more than one theme.

3 Consultation Findings

3.1 Introduction

A total of 729 people responded to the public consultation on Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020.

3.2 Overall Opinion

The vast majority of respondents (94%; n=688) agreed with the proposed amendment to the regulation and a small minority (6%; n=41) disagreed.

Opinion	Number of Respondents	% of Respondents
Agreed	688	94%
Disagreed	41	6%
Total	729	100%

3.3 Additional Commentary

Over two-fifths of respondents overall (44%; n=324) provided additional comments alongside their view of the proposed amendment while over half (56%, n=405) did not.

Of those who agreed, just over two-fifths (42%, n=289) provided additional comments. The majority of those who disagreed (85%; n=35) provided additional comments.

Opinion	Provided Additional Comments (n=)	Did Not Provide Additional Comments (n=)	% Provided Additional Comments	% Did Not Provide Additional Comments
Agreed	289	399	42%	58%
Disagreed	35	6	85%	15%
Total	324	405	44%	56%

3.4 Key Themes from All Respondents

The Table below illustrates the themes from the 324 respondents who provided additional comments.

Theme	Number of Occurrences	% of Respondents
Agreed	137	42%
Other Considerations	72	22%
Maximum Permissible Age	57	18%
General Comment	43	13%
Waivers	39	12%

3.5 Key Themes – Respondents who Agreed

688 respondents agreed with the draft proposal and 42% (n=289) of these respondents provided additional commentary.

The Table below illustrates the number of occurrences by theme and the percentage of respondents who provided commentary. It is noted that the majority of respondents choose to comment on other matters than the specifics of the draft proposal.

Theme	Number of Occurrences	% of Respondents
Agreed	137	47%
Other Considerations	59	20%
Maximum Permissible Age	47	16%
General Comment	37	13%
Waivers	28	10%

Key observations are:

- The most frequently occurring theme was reiteration of their agreement or appreciation of the draft regulation. This was expressed by almost half of Agreed respondents (47%, n=137). Typical responses from respondents were:

“Thanks for helping the industry”

“The proposed renewal fee waiver would be a small gesture but very welcome”

- The second most frequently occurring theme was about other considerations. While these respondents agreed with the draft proposal, they also took the opportunity to suggest that more could be done and most provided suggestions. Suggestions included:
 - Plate transferability and buy-back
 - Greater financial support, either through tax breaks, loans or grants
 - Tackling the cost of insurance
 - Extensions to expired licence period
 - Issuing no/fewer new licenses.

Not all these matters may fall within the remit of the NTA.

- Almost one sixth of respondents (16%; n=47) who agreed with the draft proposal and who made additional comments chose to comment on the MPA¹ and all wished to see the MPA for taxis increased.
 - Approximately half of these respondents who wished to see the MPA for vehicles increased did not specify a maximum age limit.
 - Over a quarter wished to see the MPA increased to between 12-15 years.
 - A small number requested that vehicles reaching their MPA in 2021 be given a one year extension; it is unclear if they were aware of the NTA's proposal in this regard.
 - One respondent wished to see a two year extension while one respondent wished to see the MPA abolished.
- A small proportion of respondents (13%, n=37) who agreed with the draft proposal also took the opportunity to highlight the precarious state of the taxi industry and/or their own personal circumstances. Some asked explicitly what the draft regulation meant for them.
- A small proportion of respondents (10%; n=28) agreed with the draft proposal but took the opportunity to suggest that the proposal should go further. The most common views were:
 - Waivers should have been applied in 2020 or 2020 fees refunded.
 - It should be for a longer period, two years being the most common request.
 - All fees should be waived, for at least one year or for a longer period depending on the ongoing pandemic.

3.6 Key Themes – Disagreed

41 respondents disagreed with the draft proposal and the majority of these respondents (85%, (n=35) provided additional commentary.

The Table below illustrates the number of occurrences by theme and the percentage of respondents who provided commentary.

Theme	Number of Occurrences	% of Respondents
Other Considerations	13	37%

¹ It is noted that the MPA was not part of the proposed draft regulation for this consultation. As previously noted, the NTA has a separate proposal on extending the maximum permissible age and this had been subject to a separate consultation exercise. The majority of respondents commenting on the MPA as part of the consultation of fees did not appear to have responded to the public consultation on extending the maximum permissible age.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations
2020 - Analysis and Reporting

Theme	Number of Occurrences	% of Respondents
Waivers	11	31%
Maximum Permissible Age	10	29%
General Comment	6	17%

Key observations are:

- Some respondents suggested other considerations including extension of the period to renew a license, issuing no new licenses, providing some financial support, and reducing driving license fees. Two respondents wanted the NTA to keep all proposals under review, given the uncertainty around Covid-19.
- Some respondents considered that all fees needed to be waived while some considered that the proposed waivers should apply to 2020 (or a refund) and/or for 1-3 years.
- Some respondents commented on the MPA and their suggestions ranged from a two year extension for all taxis to increasing the MPA beyond the term suggested in the proposed regulation.
- A small number choose to make additional comments which included a few queries and some general comments on the support offered to the taxi industry.

3.7 Summary

- The vast majority of respondents (94%; n=688) agreed with the proposed amendment to the regulation.
 - An analysis of their commentary indicates that while respondents agreed, a notable percentage of them took the opportunity to suggest modifications to the draft regulation and/or suggestions on other aspects of taxi regulation.
- A small minority (6%; n=41) disagreed with the proposed amendment to the regulation.
 - An analysis of their commentary indicates that respondents disagreed because they did not consider the draft regulation went far enough and more support was required.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations 2020 - Analysis and Reporting

Appendix 1 – NTA Website

Public Consultation on Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020

NTA is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland. As part of this regulatory function, and in accordance with Section 7, *Licensing regulations*, of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in relation to the fees charged in respect of applications for licences and other matters relating to licences.

Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specifies the fees payable in respect of the renewal of an SPSV licence for both six and twelve month licence periods. The annual SPSV licence renewal fee currently stands at €150 for non-wheelchair accessible vehicles and €75 for wheelchair accessible vehicles, however licences held in respect of vehicles which have reached their 10th anniversary of initial registration, must be renewed every six months at pro-rata rates.

As at 09 October, the SPSV fleet comprised 22,020 taxis, hackneys and limousines in active and inactive licence status (i.e. eligible to be renewed). To assist the SPSV industry which has been devastated by the COVID-19 pandemic and to retain a supply of SPSVs for the travelling public nationwide in the future, the Minister for Transport's 2021 Budget speech specified that funding would be made available to NTA to waive standard vehicle licence renewal fees for the calendar year 2021. The intention of the 2021 renewal fee waiver is to keep operators attached to the industry through financial assistance, coupled with regulatory, technical and health guidance provided.

The purpose of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020 is to give effect to the renewal fee waiver by temporarily amending the renewal fees referenced in Schedule 1 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 through a standalone, time bound clause for the calendar year 2021. This amendment is intended to be made as an exceptional provision and emergency measure resultant from the COVID-19 pandemic, noting that public transport, specifically including small public service vehicles, is deemed by Government an essential service.

The terms and conditions applicable to SPSV inspections including those governing cancellations and no-shows, will also be amended in light of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2020.

NTA temporarily waived late renewal fees (up to €500) from 28 March 2020 to 31 March 2021. NTA has extended this temporary late renewal fees waiver has been extended to 12 June 2021. After this date, a reduced late renewal fee will be payable in respect of renewing an expired SPSV licence until 31 December 2021. Thereafter, SPSV licensing fees will revert to those set out in the Taxi Regulation (Small Public Service Vehicle) Regulations 2015.

SPSV licences must be renewed within 12 months of the licence entering an expired status.



National Transport Authority

SPSV Public Consultation - Draft SPSV (Emergency Measure COVID-19) (Fees) Regulations
2020 - Analysis and Reporting

Draft Regulation Link

[Draft Small Public Service Vehicle \(Emergency Measure COVID-19\) \(Fees\) Regulations 2020](#)

All submissions must include the full name and email address of the person making the submission. NTA is subject to the provisions of the Freedom of Information Act 2014 and, therefore, must consider any request for information made under that Act. Any submissions received may be published.



Contact us

Robert Costello
Infrastructure & Government
T +353 87 050 4428
E robert.costello@kpmg.ie

Maria McDonnell
Infrastructure & Government
T +44 7796 370 263
E maria.mcdonnell@kpmg.ie

www.kpmg.com

© 2020 KPMG, an Irish partnership and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

The KPMG name and logo are registered trademarks or trademarks of KPMG International.