

Regulatory Consultation Report

National Maximum Taxi Fares



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1 Introduction

The National Transport Authority (NTA) is responsible for regulation of the small public service vehicle (SPSV - taxi, hackney and limousine) industry in Ireland.

It is a statutory function of NTA under the Taxi Regulation Act 2013 to develop, operate and maintain a regulatory framework for the licensing and regulation of the standards to be applied to small public service vehicles and their drivers, and the provision of services involving small public service vehicles.

As of 30 April 2022, the SPSV fleet comprised 22,155 taxis, hackneys and limousines; 84% of licences related to taxis. Ireland has approximately 3.7 SPSVs per 1000 people, for taxis only this is 3.2 per 1,000. In Dublin, there are approximately 7.0 taxis per 1,000 people. For comparison, the UK has 4.4 SPSVs per 1,000 people and 1.2 taxis per 1000.

All taxi drivers operate within a set fares structure, detailing the maximum fare that may be charged by a driver of a taxi for any journey. This fare is calculated on the basis of both time and distance travelled and is visible to all passengers on a fixed taximeter in the front of the taxi. A driver is entitled to charge a lesser fare than that calculated on the taximeter for any journey but may not charge more. A maximum fare only applies to taxis, as both hackneys and limousines must be pre-booked, with a fare agreed in advance. Taxis may be hailed off the street or picked up at a rank without any pre-booking.

Section 24 of the Taxi Regulation Act 2013 empowers the NTA Board to make a “Maximum Fares Order” fixing the maximum fare that may be charged by the driver of a taxi for any journey. To create an appropriate maximum fares order proposal, NTA conducts a national fares review with the assistance of an independent consultant. The objectives of the 2022 Fare Review were to:

- Estimate the average activity level of taxis in an average year based on survey data and Central Statistics Office (CSO) data (given the impact of Covid, this was taken as 2019).
- Update each element of the Taxi Cost Index (TCI), including the “fixed cost” of an average taxi, the running costs of an average taxi based on the activity levels determined and labour costs.
- Assess the appropriateness of the current fare structure.

Following this, all stakeholders are invited, by way of advertised public consultation or specific statutory consultation, to comment on any maximum fares change proposals made by NTA on foot of this published review. This report to the NTA Board is the outcome of this public consultation.

2 Background

2.1 Maximum Fares Order - Legal Basis

Section 24 of the Taxi Regulation Act 2013 empowers the NTA Board to make a “*maximum fares order*”.

“24. (1) The Authority may make an order (in this section referred to as a “maximum fares order”) fixing the maximum fares that may be charged by the driver of a taxi.

(2) Different maximum fares may be fixed under this section—

(a) in respect of hires engaged on a single hire basis and on a shared hire basis,

(b) for different circumstances or times.

(3) Before fixing maximum fares under this section the Authority shall—

(a) consult with—

(i) the Advisory Committee, and

(ii) the Legal Metrology Service,

(b) publish a notice on its website and in one or more national newspapers—

(i) indicating that it is proposed to exercise the function, and

(ii) stating that representations in relation to the proposal may be made in writing to the Authority before a specified date (which shall be not less than one month after the publication of the notice), and

(c) consider any observations made by the Advisory Committee, the Legal Metrology Service and any representations made pursuant to paragraph (b).

[...]”

The 2019 proposed maximum fares order recommended an increase in the national maximum taxi fare of 5 per cent. However, due to the disruption to the hospitality, tourism, leisure and taxi industries following the onset of the Covid-19 pandemic and travel restrictions and in recognition of passenger reaction to an increase at that time, the Advisory Committee on Small Public Service Vehicles, taxi industry group representatives, NTA and the Department of Transport agreed that the commencement of the Maximum Fares Order be postponed. Therefore, this fare review is to account

for the 2019 fare review also. The last implemented fare review occurred in 2017 and the current maximum fare order, which was approved then, can be found below:

	Standard (08.00h- 20.00h)	Premium (20.00h-8.00h, Sundays and Bank Holidays)
Initial Charge	€3.80	€4.20
Tariff A (Up to 15 kms)	€1.14 per km €0.40 per min	€1.45 per km €0.51 per min
Tariff B (Over 15kms)	€1.50 per km €0.53 per min	€1.80 per km €0.64 per min

2.2 Proposal

The Taxi Cost Index (TCI) is a quantitative tool used by NTA to assess the change in the costs associated with operating a taxi. The TCI is recalculated approximately every two years based on published price indices and industry prices and provides a standardised approach for analysing cost changes in the taxi industry and assessing the need for fare adjustments.

Individual taxi drivers face unique and diverse operating costs that depend on their individual operating characteristics, as well as wider market conditions. In the current review, increased fuel costs have been particularly pertinent. The TCI does not seek to represent the overall cost faced by any individual driver, but rather provide an estimate of the costs faced by taxi drivers on average. This approach is guided by the following principles:

- The TCI must be representative and reflect the changes in costs faced by a significant proportion of the industry.
- It should reflect a fair return for the labour provided by the taxi driver.
- It should be based on a driver that follows industry-leading practice.
- The costs included in the TCI consist of all major running and fixed costs, as well as a labour cost component, with the costs being combined to achieve an overall indicative cost of taxi operation per annum.

The costs included in the TCI consist of three components – Running Costs, Fixed Costs and Labour Costs. The build-up of each of these is set out in the tables below. Further details can be obtained from the 2022 National Maximum Taxi Fare Review Report provided to the April 2022 Board meeting. 2019 has been taken as the reference year for activity given it was the last year for normal taxi operations.

Running costs

	Activity Level	
	2019 CSO Estimate	2019 Drivers' Estimate
Index Component	30,352 km	42,000 km
Fuel	€2,390	€3,307
Servicing	€436	€603
Cleaning	€1,073	€1,073
Tyres	€389	€539
Spares	€284	€393
Miscellaneous Running Costs	€300	€300
Total Running Costs	€4,873	€6,216

Fixed costs

Index Component	2021 Cost
Car Purchase and Finance	€3,899
Insurance	€1,867
Affiliation – traditional dispatch operator/ app service	€2,872
Equipment Replacement – regulatory requirements	€230
Taxi Vehicle Licence Renewal	€150
Motor Tax	€95
Airport Charges	€41
National Car Test (NCT)	€62
Meter Verification	€43
Meter Calibration and Programming	€45
SPSV Driver Licence	€50
National Driver Licence	€6

Total Fixed Costs	€9,360
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Labour Costs (Taken from a CSO Index for “Production, transport, craft and other manual workers”)

Index Component	2021 Costs
Labour Costs	€ 30,083

Adjusted TCI changes, 2017 - 2022

Year	CSO Reported Activity Levels			Driver Reported Activity Levels		
	2017	2019	2022	2017	2019	2022
KM	32,624 km	29,951 km	30,352 km	49,000 km	42,000 km	42,000 km
Running Costs	€4,309	€4,235	€4,873	€5,825	€5,430	€6,216
Fixed Costs	€11,480	€11,321	€9,360	€11,480	€11,321	€9,360
Labour Costs	€23,945	€25,878	€30,083	€23,945	€25,878	€30,083
Total Costs	€39,734	€41,435	€44,315	€41,250	€42,629	€45,658
% Change 2017-2022			11.5%			10.7%

Overall, the TCI increased between 10.7 and 11.5 per cent between 2017 and 2022.

Mandatory acceptance of card payments in taxis is also proposed to be introduced in tandem with this fare adjustment, and an allowance has been included in the proposed increase. A further adjustment of the recommended maximum fare of 1% for the costs associated with cashless payment facilities, being transaction fees and hardware provision is recommended. It is important to note that not all fare payments will be made by cashless means or attract transaction fees.

Including this provision for cashless payments, the recommended 2022 Maximum Fare increase is **12%** to reflect the increase in operating costs faced by taxi drivers.

The tables below show how the increase of **12%** would be applied to the existing fare structure. There is a weighting towards the Premium Rate in the expectation that this will incentivise drivers to operate when the demand for the service is greatest.

Existing Maximum Fare Structure

	Standard (08.00h-20.00h)	Premium (20.00h-8.00h, Sundays and Bank Holidays)
Initial Charge	€3.80	€4.20
Tariff A (Up to 15 kms)	€1.14 per km €0.40 per min	€1.45 per km €0.51 per min
Tariff B (Over 15kms)	€1.50 per km €0.53 per min	€1.80 per km €0.64 per min

Proposed Maximum Fare Structure

	Standard (08.00h-20.00h)	Premium (20.00h-8.00h, Sundays and Bank Holidays)
Initial Charge	€4.20	€4.80
Tariff A (Up to 15 kms)	€1.30 per km €0.46 per min	€1.71 per km €0.60 per min
Tariff B (Over 15kms)	€1.65 per km €0.58 per min	€2.00 per km €0.71 per min

3 Consultation Overview

On 25 April 2022, NTA published the proposed Maximum Fares Order, together with the National Maximum Taxi Fare Review and an associated factsheet, on both the NTA (industry) and Transport for Ireland (public facing) websites. Also on that day, a text message was issued to 17,728 licence holders for whom we have mobile telephone numbers, and an email to 23,775 SPSV licence holders notifying them of the public consultation. Newspaper advertisements were also placed in the Independent and Examiner newspapers and their online platforms. There was extensive media coverage in the following days.

Representations on the proposed Maximum Fares Order were invited from any interested parties via online form or by post. Email was also accepted. The period of the consultation was 25th April 2022 to 27th May 2022 inclusive. The NTA consulted directly with the Advisory Committee on SPSVs, the Legal Metrology Service of the National Standards Authority of Ireland, An Garda Síochána and the Department of Transport.

The 2022 Maximum Taxi Fare Review and consultation process was announced to industry members by newsletter, text and/or email on the following dates:

21 February	01 March	10 March	11 March
25 April	16 May	18 May	25 May

A total of 541 submissions were received during the consultation process. All submissions received have been referenced in this report.

Most submissions were received via an online CiviQ survey platform published by NTA on its website. The online survey contained the following fields:

- Data Privacy Statement (Agreement required to proceed)
- Your Interest
- Full Name
- Email Address
- Opinion on Proposed Maximum Fares Order
 - Agree
 - Disagree with reason

- Unsure/no clear position
- Additional Commentary (optional)

Online Submission Form – Example

Data Privacy Statement



Please indicate that you agree with the [NTA Public Consultation Privacy Statement](#) and [CiviQ Consultation Statement of Privacy](#). If you require further information please contact privacy@nationaltransport.ie.

☐ I agree

Your interest *

Please enter your interest from the list below

- ☒ Member of Public / Non-Industry Member
- ☐ Taxi Driver / Owner
- ☐ Taxi Industry Representative
- ☐ Other

Other (please specify)

Full Name *

Please enter your email address *

Please re-enter your e-mail *

Email addresses may only be used once to make a submission

Proposed Maximum Fares Order

Your opinion *

- ☐ I agree with the proposed taxi fares increase
- ☐ I disagree with the proposed taxi fares increase
- ☐ Unsure / no clear position

Reason for disagreeing *

- ☐ Fare increase should be higher
- ☐ Fare increase should be lower
- ☐ No increase / fares should remain unchanged
- ☐ Other (specify reason in additional commentary)

Additional commentary (optional)

Please note, due to the large volume of submissions received by NTA, only commentary directly related to the proposal will be considered.

3.1 Reporting

The CiviQ online platform was utilised by the majority of the respondents. The following actions were completed following the closure of the consultation:

Data cleansing

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

Data coding

All submissions were read, interpreted and categorised against the trends and themes that emerged. In a number of cases, respondents' comments contained more than one theme and for these submissions, multiple themes were assigned to the submission.

Reasonable endeavours were made to ensure consistency in the application of themes including a quality review of a sample of analysed responses, but it is noted that while most respondents were reasonably clear in presenting their views, some submissions did contain a degree of ambiguity.

4 Submissions

Introduction

A total of 541 responses to the public consultation on the Proposed National Maximum Taxi Fares were received. This total includes those submissions where the opinion selected was '*Unsure/no clear position*' but which were accompanied by additional commentary, which has

also been categorised and referenced in this report. Below is the stated interest of the respondents.

Interest	Submissions
Taxi Driver / Owner	361
Member of Public / Non Industry Member	161
Other	17
Taxi Industry Representative	2
Total	541

4.1 Overall Opinion

81% of respondents (437) agreed with the proposed Maximum Fares Order, with 17% (94) disagreeing, and 2% (10) citing no clear position but providing commentary. The reasons for disagreeing with the proposal is also set out below:

Opinion	Number of Respondents	% of Respondents
Agree	437	81%
Disagree	94	17%
Unsure / no clear position	10	2%
Total	541	100%

Reason for disagreeing (17%)	Number of Respondents
Fare increase should be higher	5
Fare increase should be lower	21
No increase / fares should remain unchanged	56
Other (specify reason in additional commentary)	12
Total	94

4.2 Themes in additional commentary by interest

The table below illustrates the themes raised by the 151 respondents who provided additional comments broken down by their stated interest.

Themes	Industry Member	Consumer	Industry Representative Group	Other	Total
Fuel Costs	29	10	1	3	43
Operating Costs	29	7	1	5	42
Cost of Living	28	9	1	4	42
Satisfied with Increase	24	8	1	6	39
Decrease Fares	15	13	0	2	30
Increase Overdue	13	2	0	1	16
Further Increase Required	14	1	1	0	16
Taximeter Reprogramming Costs	14	0	0	0	14
Cheaper Modes of Transport	9	0	0	0	9
Fare Structure Re-Design	5	1	0	3	9
Insurance Costs	6	2	0	0	8
Standards of Service	2	3	0	1	6
Dispatch Operator/Bank Commissions	3	3	0	0	6
Additional Charges Required	4	0	1	0	5

A significant number of respondents welcomed the increase mentioning that it is long overdue with the increase in fuel costs, operating costs and the cost of living. A number of respondents would also welcome a further increase in fares or fare structure redesign removing the maximum ceiling and permitting surge charges.

Some submissions expressed concern that the effect of the increase would deter customers from taxis to cheaper modes of transport, these respondents mentioned a decrease in fares would entice customers to use taxis. It must be noted that this proposed maximum fares order relates only to the upper ceiling fare which may be charged by a driver. Fares lower than those calculated on the taximeter are entirely permissible and widely used as promotional or loyalty rewards by drivers.

Some drivers expressed concerns that the increase was not worth it against the cost to update the fares on the taximeter. Taximeter reprogramming costs are factored into the TCI as part of the operating costs faced by drivers. A generously rounded up cost of €200 over two years for this reprogramming sits against over €3,000 uplift in fares annually on 2019 activity levels.

It is interesting, and reflective of the research completed, that concerns over insurance costs have reduced dramatically from previous reviews.

All online submissions are detailed in Appendix A

4.3 Submissions from Taxi representative Groups

Irish Taxi Driver's Federation

The email we received from your office states the cost of running a taxi since 2017 has risen between 10.7% and 11.5 % and says a 12% increase on the taximeter which also incorporated card reading devices. Credit cards like Amex / American express and Diner along with some outside EU/UK cards carry a 5% and more commission so that mean that realistically you are proposing a 7% increase to the taxi industry. We propose a 12% increase excluding any card charges due to the higher cost of purchase and running a taxi. The C.S.O. figures for inflation up the end of March was 6.7% and the consumer price index was 8.5% to the end of March. Up to the end of March this year fuel prices has gone up by 33%.

The I.T.D.F propose to allow an emergency charge for example €1 to be added on to a €10 fare and €2 to a €20 fare this is a 10% emergency fuel charge. You made emergency changes to compensate for a public holiday on the 18 of March this year and also with the card reading devices to cover the card percentage. A precedent has being set already. We also propose that when taximeters have to be reprogrammed that you put in a 3% annual increase that can be pre-programed on the meter to automatically come into effect on an annual bases rather than every 2 years.

T.T.n.H - Tiománaí Tacsáí na hÉireann

Whilst this maximum fares order consultation was mentioned in the subject line of this submission, along with the proposed cashless payment facility regulation, no comment on the proposed maximum fares order was made.

4.4 Submissions from "Other" Interest

An Garda Síochána

The issues regarding increased fares will have no impact on An Garda Síochána from a roads policing perspective.

Bolt

During recent years, Ireland has experienced, along with the rest of Europe and most of the world, a period of considerable disruption. This situation has now morphed into another period of uncertainty driven by inflation, supply chain issues and skills shortages. All of these impacts will introduce significant new challenges to an industry that has been severely buffeted by recent events.

Whilst not implying or making any criticism of the NTA as this was predominantly caused by events beyond its control, the taxi industry in Ireland has experienced a seven-year period with effectively only one fare increase. This situation is now acute as the taxi industry's own inflationary pressures (vehicles (second hand 27% , new 11% , spare parts, fuel (Diesel 32% and petrol 29%), insurance etc.) considerably outstrip the general rate of inflation, reported as 6.9% in March 2022 and are anticipated to rise further.

A recent survey showed that taxis in Dublin compared to other cities worldwide are in the lower mid quartile of pricing with most European cities in the upper mid and upper quartile of pricing. This is further evidence of the Irish industry's weak fare levels and the need to address the maximum fare levels to bring Dublin and, therefore the rest of the country, into line with peer cities. The effect of seven years of modestly growing costs and stagnant earnings has been impactful for taxi drivers and those employed directly and indirectly in the industry. Recent sharp increases in many of the costs that taxi drivers cannot avoid or mitigate will have serious effects on viability. The freeze on fares has also had an impact recently for people wishing to use taxis to go out or get home in the evenings or for business travel. The flattening effect of no fare increases has made taxi driving a less attractive career option and the industry has seen attrition to other better paying occupations.

This has serious implications for passenger safety where vulnerable potential passengers, who have relied on a taxi home, experience difficulties in finding one, with worrying and potentially serious consequences. The supply difficulties are well known in Dublin but are now also being experienced across the country. Bolt believes that the taxi service in Ireland is a vital service for many groups of people and is used for multiple purposes, as well as being a major employer. It is therefore important that the industry remains viable enabling adequate supply, the generation of sufficient income to renew and invest in vehicles and technology and that potential drivers are attracted to the industry and existing drivers can remain within it.

Fare levels are an important input to these objectives. Bolt is pleased that the NTA has recognised the need for a significant increase to both reflect the sharply upward impact of the cost of the fundamentals of providing the service but also the loss of income over recent years. Bolt welcomes this consultation and is generally supportive of the proposals whilst remaining sharply conscious of affordability.

Cork Chamber

Cork Chamber is cognisant of the many challenges and pressures the taxi sector has faced over the past two years in the wake of the COVID-19 pandemic and continues to face as the War in Ukraine impacts our supply-chains resulting in inflation and fuel price surges.

Considering the current economic environment and the review the NTA undertook, we are supportive of the 12% increase in the National Maximum Taxi Fare. It is essential that taxi drivers receive a fair and decent wage as service providers and valuable community members. We advise that perceptions and reactions of taxi users to these price increases are managed effectively, through the supply of information in relation to the rising costs and pressures the sector is facing.

Dublin Town

Dublin Town supports taxi drivers receiving an appropriate income that reflects the increased cost base, which they are experiencing. We believe that the proposals set out by the NTA in this regard appear fair and reasonable.

Dublin Town supports a premium rate for drivers who provide a service at less sociable hours, at night and bank holidays. The availability of taxis at night, is an increasingly significant issue for the city's Evening & Night Time Economy trades. Customers are complaining of the unavailability of taxis late at night and impact that this has on their ability get home safely following a night out. Workers in the evening & night time economy have also raised issues of taxi availability at night.

Dublin Town would see the above in the context of raising standards and the enhancement of the customer experience. We would envisage the renewal of the programme to provide more comprehensive night time public transport, which had begun before the pandemic struck.

Free Now

FREE NOW welcomes the NTA's proposed Maximum Fares Order. The taxi fare structure has not changed since 2018 and in the meantime, the cost of operation has risen sharply for taxi drivers. FREE NOW notes the importance of fair remuneration for drivers in line with the increased costs of living.

Irish Wheelchair Association

At IWA we understand the cost of fuel has risen which make it harder for individuals to run a taxi. The knock on affect from this is that while public transport is not accessible to all the cost is put on a person who is trying to survive on very low income and no supplement for extra travel cost

National Disability Authority

The NDA notes that the NTA is proposing that the 2022 Maximum Fare increase is 12% to reflect the increase in operating costs faced by taxi drivers as per the change in the TCI, together with the introduction of cashless payment facility mandate.

The NDA notes that persons with disabilities can be particularly at risk of poverty and deprivation. Additionally, the 2021 Indecon survey on the Cost of Disability in Ireland found that households spend, on average, an additional €9,027 on costs of items specifically related to disability, special versions of products, and transport and mobility. This study found that overall, there are significant additional costs faced by individuals with a disability which are currently not met by existing programmes or by social welfare payments and that actual costs faced by individuals with severe disabilities on average range from €9,600 - €12,300 per annum and for those with limited disabilities from €8,700 - €10,000 per annum.

Therefore, taxi fare increases may negatively impact persons with disabilities more than other groups in society. We would strongly encourage further consultation with disabled persons organisations (DPOs) and persons with disabilities on the matter of taxi fares. In the absence of the mobility allowance, this increase in fares may result in increased social isolation, deprivation, and health impacts for persons with disabilities in Ireland. The NDA advises that clear and universally designed communication on this matter is key. All information (written, spoken, signed and digital) delivered by a public transport services provider (which includes consultation information), should be universally designed. The NDA suggests that the NTA should use the Customer Communications Toolkit for the Public Service - A Universal Design Approach which will help to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone.

Uber

Uber agrees with the proposed Maximum Fares Order by the NTA. However, Uber recommends introducing greater pricing flexibility, such as decoupling of pre-booked fares from the taximeter, and replacing the €2 booking fee with a transparent, dynamic fee, e.g. on distance to travel to a pickup point.

In accordance with Section 24 (3) of the Taxi Regulation Act of 2013, before setting maximum fares, NTA is required to consult with -

- (i) The Advisory Committee on Small Public Service Vehicles; and
- (ii) The Legal Metrology Service of the National Standards Authority of Ireland.

A letter detailing the maximum fares order proposal was sent to the Advisory Committee on Small Public Service Vehicles and to the Legal Metrology Service on 25 April 2022. A copy of each and the responses received can be found in Appendix A. The Legal Metrology Service clarification was completed.

5 Appendix A

Submissions with Commentary	
Opinion	Commentary
I agree	There should be consideration made of the increase in fuel costs over the last few months which as far as i can tell haven't been costed in
I agree	The cost needs to cover expenses of any business...something basic of economies
I agree	The vehicle age limit should also be increased to 15 years
I agree	I agree with the proposed increase, it is necessary to keep taxi drivers in the business so they can earn a decent living wage to survive in a world where everything else is going up in price especially running cost such as fuel
I agree	Due to increased cost
I agree	However, instead of costing us the fee to change our meters, why not allow us to reclaim the VAT on fuel. Fuel is the main issue now and if we have to pay to have our meters calibrated, it will take months to get that fee back in fares. Or else, allow us to have the recalibration free under C19.
I agree	Delighted with the proposed increase and even happier that card payment would be made mandatory.
I agree	Everything is more expensive like few years ago, all business increase price only taxi business is regulate by NTA and we lose plenty of money for expensive car service petrol and crazy huge insurance for taxi
I agree	Fuel increases alone.
I agree	Taxi drivers did a great job during the pandemic and need to be rewarded.
I agree	This is long overdue
I agree	Seems about right since it has been over 4 years since the last fare increase.
I agree	But I do not agree with compulsory card machine because a we do not receive payment until week later after commission already we pay 15% to free now and already pay transactions on card transfers with increasing fuel bills now only trans should allowed should be immediate ones straight into account
I agree	I agree with the increase of up to 12%, as the cost of operating over the last 3 yrs. is punitive. The cost of a new meter programme can be upwards of €80 and the cost of resealing the meter is over €100. A fee waiver for sealing should also be applied.
I agree	I have just updates my taxi meter and seal it, and paid 150€, do I have to pay again when Fare changes?
I agree	The running cost are gone very high now in the business.
I agree	Good it's urgently required to increase the fare because of the current fuel prices etc.
I agree	Considering the high cost of fuel and many suffered because of the pandemic a substantial increase is warranted. I regularly get taxis from Dublin airport and compared to other cities i visit Dublin taxis are quite cheap
I agree	Ok
I agree	I think this will be a huge benefit to industry
I agree	Tariff increase is a welcome, it is important to work along with inflation. Also, please reopen saloon/ normal plates for sale or buy back for individuals rather than corporates, as rents are quitting this industry because they have to pay heavy rent.
I agree	After 4 years I think we are due to get one that takes the present cost of living into consideration.
I agree	Very things gone up, card machines also take commission, fuel up, maintenance cost up, those drivers are working for less, all those companies take commission and base fee, they have to pay from their earnings, poor drivers

I agree	As a Taxi driver, I agree with the increase. I would ask that some consideration be given to the 9 year rule as this is an added expense to have to change perfectly good vehicles that pass NCT and suitability tests. I also feel that door decals are no longer required as they our private vehicles too.
I agree	Credit card transactions are charged at 1.50% by the provider, so 1 % increase for that is not justified. Please reconsider
I agree	I agree as the running costs have increased significantly in the last few years especially the fuel. It costs me 50% more now to fill my tank
I agree	Due to the massive increase in running costs 12 percent minimum should be implemented
I agree	The industry hasn't had a fare increase while the cost of operating in this industry and inflation has increased year on year. It's the only part of the transport infrastructure not to have had a fare increase.
I agree	The cost of running a taxi is much more expensive now and an increase is well overdue.
I agree	It should be at least 20% increase not 12% as we are suffered whole pandemic...
I agree	I think it is just about a proposal/decision in view of the related circumstances.
I agree	We need a fare increase of at least 10%. It will be future proof for a couple of years. 10 or 11 is about the same for a customer but it makes a difference for drivers.
I agree	Fares should start @7.50
I agree	With running cost and price of diesel it will help sooner the better
I agree	Totally agree because of inflation housing issues rents triple fuel double maintenance parts double fare has not been changed since then thank you. Kind regards
I agree	It seems everyone who comes into this country pays extra for luggage, abroad, ie taxis, airlines before they get here, so, why can't Irish taxis charge for luggage. There is no incentive to take passengers with extra luggage.
I agree	I think the initial starting fare is high enough and shouldn't be changed... Just the price per km and by a max of 10%
I agree	There should be 3rd premium rate between 10 pm to 02 am as they are already using in London
I agree	While a fare increase is greatly welcome with the price of everything going up, can parking charges and future drop off fees the might be introduced or incorporated into the fare structure(like tolls) that they can be charged as incurred.
I agree	Taxi fare remained the same for the last four years. Ever since the cost of running taxi business increased dramatically due to rising cost of fuel. It is about time to hike fares.
I agree	It has to increase. Petrol/ diesel is more and more expensive. Need to pay high insurance. All the prices have gone up but not the taxi fares. They need to be adjusted.
I agree	Would like to get into the Taxi industry L8813
I agree	Has to increase up to 15 to 20 percentage. Everything price gone up. Struggling to look after family.
I agree	Because all the prices have increased for all the services, I think they deserve as well to have an increase in fees. The drivers are saying that they pay a lot of money for taxes, fuel, insurance and need to have this higher than 2017 introduced fees.
I agree	I think the price of fuel justifies an increase in fares so as a taxi user I can accept this. However, I think the NTA need to start issuing new normal licences again. Your stats say no new regular licences have been issued since before 2011. It is becoming impossible to get a taxi!
I agree	I agreed with the fare increased. Cashless payment must not be mandatory due to Internet Availability in some part of the country. Internet connection is very poor in some areas especially in the mountains or hill area. Strictly, there should not be €200 Penalty for not accepting card Payment.
I agree	Since the petrol price has increase, it is hard to survive in the industry. Especially drive renting out the plate and paying insurance is getting harder.
I agree	It's about the time
I agree	I think this increase it has to take place as the costs of living are higher, the fuel prices are higher ...so by having a higher fare will complement the extra expenses

I agree	agree with this as the cost of operating a Taxi is getting too high and it seem we are only working to cover the rising cost and forcing drivers out the market and making harder to go out in to work especially the daytime fares are way too low .
I agree	It is definitely needed as other professions have received wage increases in recent period due to increase in living expenses and operating expenses for taxi drivers.
I agree	Maybe closer to 15% would be right.
I agree	Update and reselling of meter should be done free
I agree	I strongly disagree with the cost of recalibrating the taximeter following any increase in fares. Contradiction in terms.
I agree	Long time coming and it is disturbing that an increase consultation process has not been started sooner.
I agree	Taxis are too cheap in Ireland compared to our European neighbours and operation costs are more too.
I agree	Fare increase is long overdue; Taxi drivers are struggling with increased costs since the last fare increase.
I agree	Fuel prices, maintenance expenses, tyre etc... Are almost doubled compared to 2017.
I agree	I agreed with the fare increase and would like to see a higher increase due to overall business running costs the past 4 years
I agree	Industry biggest problem is drivers. Psv exam is difficult and irrelevant in a lot of cases Irish drivers will not get licence, as a lot of the very suitable applicants are afraid of the test as they did not work in academic settings. Maybe a more education and practical day
I agree	I agree with a fare increase due to increased running cost in the taxi business I would like to see a higher increase than what is been proposed.
I agree	Normally, I would not want this because the cause to implement such a measure outweigh any benefits. Further, the NTA should have a waiver for implementing Taxi Meters to be altered/ Changed
I agree	If increasing the Taxi Fare will help people get a Taxi at Nighttime I am all for it. In any event, Taxi Drivers need help with the Extra Fuel Costs
I agree	Cost of living went up including for taxi drivers. Besides, fuel prices are at an all-time high.
I agree	All the prices for services have increased and the minimum wage have increased every year but the taxi drivers have the same 'salary' with no increase for many years. I think they need to be supported
I agree	Fare increases may be necessary but the regulator should also look to Europe for best practices e.g. fixed fares from key locations e.g., Dublin or Cork Airport to the city centre as is done for Charles de Gaulle in Paris.
I agree	Needs to happen ASAP or i will have no option but to leave the industry Regards
I agree	I feel it's a fair increase that's long overdue considering hardly no earnings over the last 2 years through covid and with everything on the increase fuel service and the full operating of a taxi
I agree	Due to the huge increase in running costs, with fuel costs skyrocketing, plus the general inflation this country has seen in the past 4 years, the cost of getting a taxi should increase in line with this. However, no increase has been seen in 4 years, this should be remedied.
I agree	I would increase fares for nighttime more than the daytime. It would encourage people to work more at night when is a shortage of drivers.
I agree	If the regulator wants to bring in a national minimum fare then they should insist that the driver gets the full fare. If the driver gets the fare through a booking app, he must take the fare less 15% (up to€150 a week) if booking apps need to cover costs charge it from customer and on top of fare.
I agree	I believe that the fare should be increased by 20% as the running cost have increased by about 40% when you take account of diesel and Insurance increases
I agree	It is essential that any fare increase be transparent and communicated clearly

I agree	Regret at not been given enough space for a proposal on going Electric, to benefit ALL Customer, Taxi Driver and NTA. I hope I can be given an opportunity to explain. Thank you
I agree	Good decision but the prices should be just a little bit more; instead of 12% increase, it should be 14% increase because fuel prices have gone up so much.
I agree	20% should be a minimum increase We cannot driving 100 hours/ week to pay: insurance, fuel, plate rental, car rental....
I agree	Everything get very expensive
I agree	Everything very expensive
I agree	Everything now very expensive
I agree	It probably should be a bigger percentage of an increase. We've had 4 bad years and the costs have increased dramatically.
I agree	The cost of living is gone up
I agree	Asap.
I agree	I agree fares need to be increased , also on taxi I have for example 8 seater but when taking passengers only 4 euro difference between that and car , and costs are a lot more
I agree	It's too expensive to update meter and reseal meter. Aswell as time off work for both. This needs to be subsidised by the NTA.
I agree	As i have red, the taxi fares did not increase for 5 years. I think it is time for them to earn more because all the prices are going up as well.
I agree	Will help towards fuel increase
I agree	Inflation is about 35% since last increase. This proposal is a joke.
I agree	Fuel up 70% since last year.
I agree	I fully agree with the proposed increase in fare but should you not consider an additional increase in light of the 40% increase in fuel costs in the last twelve months?
I agree	Should probably be more than what is proposed.
I agree	Fare is fare.
I agree	The taxi man deserve even more
I agree	Inflation is killing these poor taxi man.
I agree	FREE NOW welcomes the NTA's proposed Maximum Fares Order. The taxi fare structure has not changed since 2018 and in the meantime, the cost of operation has risen sharply for taxi drivers. FREE NOW notes the importance of fair remuneration for drivers in line with the increased costs of living.
I agree	I would like to say that the cost of running taxi is getting higher. The fuel prices is continuously rising. The others expenses related to Taxi maintenance e.g. car service, oil change, wear and tear etc. are getting higher too.
I agree	Uber agrees with the proposed Maximum Fares Order by the NTA. However, Uber recommends introducing greater pricing flexibility, such as decoupling of pre-booked fares from the taximeter, and replacing the €2 booking fee with a transparent, dynamic fee, e.g. on distance to travel to a pickup point.
I agree	Drivers need fuel charge of €2 per fare until rise. Pick up fare to be increased depending on distance. Drivers returning lost property to be paid €10 for journey.
I agree	Bolt believes the taxi service in Ireland is vital means of connectivity for many and to ensure this continues, believes fares need to reflect the sharp increase in the cost of the fundamentals of the service and the loss of income over recent years. Bolt is generally supportive of the proposal.
I agree	Dublin Town supports taxi drivers receiving an appropriate income that reflects the increased cost base, which they are experiencing. We believe that the proposals set out by the NTA in this regard appear fair and reasonable. Dublin Town would see the above in the context of raising standards and the enhancement of the customer experience. We would envisage the renewal of the programme to provide more comprehensive nighttime public transport which had begun before the pandemic struck. Dublin Town supports a premium rate for drivers who provide a service at less sociable hours, at night and bank holidays. The availability of taxis at night is an increasingly significant issue for the

	city's Evening & Night Time Economy trades. Customers are complaining of the unavailability of taxis late at night and impact that this has on their ability get home safely following a night out. Workers in the evening & nighttime economy have also raised issues of taxi availability at night.
I agree	I refer to the above and advise you that the Advisory Committee on Small Public Service Vehicles has considered the draft Regulations and is in favour of the proposed changes in relation to "maximum fares".

Submissions with Commentary	
Opinion	Commentary
I disagree	The cost to reprogram the taximeter in conjunction with the cost of verification outweighs any small fare increase.
I disagree	Taxi fares are not fixed and can vary hugely depending on time of day/day of week. As a driver, I want passengers in my car. I don't want to be sitting on a rank for hours on end. People have lots of alternatives to taxis that are cheaper already.
I disagree	We currently have the highest rates in the EU, the need to be lowered
I disagree	I can't afford the cost of changing my meter.
I disagree	I am people will be apprehensive in taking cabs as the fares rise!
I disagree	Every single item of daily use gone up
I disagree	Meter reseal for new fares. Meter reseal for scrapping of summer time. Meter reseal for changing car. Meter reseal for updating new bank holiday. I propose anything more than one meter reseal during the 2or3 year review be FREE. One payment of €82.10 is enough. What % fail SEAI test?
I disagree	I believe it's time we redesign the taxi fare structure. I'm in favour of scrapping the additional passenger charges for in substitution for an increased per km charge which I believe will simplify the fare structure and bring about a better predictability for customer fare estimation.
I disagree	I believe the economy will collapse soon and this will make taxis unaffordable.
I disagree	The government/NTA recently offered Taxi drivers up to €20000 for the switch to electric vehicles for those who availed of this grant their running costs have significantly reduced therefore they are not seeing the same increases as other fossil fuel drivers this should be an incentive to switch.
I disagree	The price starting on the metre should be 2.20 and nighttime 2.60 the distance and time covered can be recalibrated to the 12 per cent increase. This would encourage people to use taxis more as it looks less starting off. Increasing to 4.40 and 4.80 will put people off using the service.
I disagree	All bus and rail fares are going down why can't taxi fares do the same
I disagree	The taxi fares imo are dear enough, while insurance cost have come down fuel is astronomical, what is in need of addressing is the 9yr rule on the vehicles, year 10s 11s and 12 registered vehicles got extension but year 13,14s didn't, that's discriminating, these EV vehicles are not fit for purpose.
I disagree	People haven't got the money for cabs as it is hikes in prices will just alienate People we would be better off making an announcement saying we are not rising fares because we know people r struggling
I disagree	Increases in line with inflation.
I disagree	It already costs upwards of €35-€40 to get home from town even though it's a 20 minute drive
I disagree	In my opinion, there are not enough 24-hour bus routes/nitelinks in the city meaning people often don't have a choice but to take a taxi after a night out. I feel a fare increase would be unfair when adequate alternatives don't exist.
I disagree	Fuel cost
I disagree	Fare increase will only cover increase of the operating costs. It will not cover increase of costs of living. 100 euros today are far not the same as 100 € in 2018 for example. If fares will not be fair enough public will continue to suffer from lack of service.
I disagree	I believe that a maximum of 5% is all the public can afford at this time and the maximum without facing loss of business for taxi operators.

I disagree	Please don't increase the fares. This will only hurt and alienate the public. We need their support
I disagree	The fare increase in my opinion does not reflect an adjustment to the increased cost of fuel and electricity, nor the increased price of cars. By the looks of the figures presented, it seems like it does not adjust for the record high inflation rate and the increased cost of living.
I disagree	As somebody who was in the industry for 6 years and just very recently left I know the issues for drivers leaving the industry and also entering the industry, one of the biggest things is been restricted to a WAV vehicle you can't even get one in hybrid just fare increase won't attract anyone back
I disagree	I can't speak for profit margins, inflation, etc., however I find taxi fares already too expensive, and the proposed increase percentage seems excessive.
I disagree	The cost of taxis is already prohibitively high.
I disagree	Cost too much to get meter changed over
I disagree	The cost of living as raised exponentially in the last few months, taxi fares in Ireland are among the highest in Europe due to the taxi industry and licensing being a highly regulated industry. Fare hikes should consider the burden on end customers in a period of inflation - not corporations.
I disagree	I disagree with the 1% to accommodate the transaction fees and hardware provision if cashless payment is mandated. Any costs associated with the purchase of the necessary hardware as well as the transaction fees are tax-deductible expenses so this should be sufficient in line with other business.
I disagree	Because of the costs of changing the meter prices and cost of getting the meter resealed afterwards.
I disagree	How can you increase fares at a time like this when we haven't recovered from recent events ie. Covid and drivers would incur a cost of at least 60e to have their metres changed and another 90e to have them resealed
I disagree	Fuel prices went up 25% last few months. Inflation skyrocketing. Everything getting more expensive. Tyres, service, whole life overall. Min 25% increase should be recommended. Soilage charge should be increased to 160 euro. Price review should be done every year Taxi Meter Sealing Free Of Charge
I disagree	No increase in fares until proper taxi colour scheme put in place (i.e. all taxis should be of a certain defined colour, which would make them easier to recognise for both locals at night and visiting tourists), cashless option put in place, ability to scan a QR code in taxi to reveal driver info.
I disagree	Pushed down the road for Two years, see then the economic status of the country. With inflation. Having reduced other public transport of bus and rail, you're going to create an us and them increasing taxi fares. Driving people away from taxis.
I disagree	Although costs have undoubtedly risen, business for the moment has increased post pandemic. With public transport fares decreasing and the availability of more 24-hour bus services soon, I don't think it's an appropriate time for an increase. I am Dublin based so my opinion is based on that fact.
I disagree	I think the increase would actually reduce income due to current circumstances. Help to reduce costs would be more beneficial. Thank you.
I disagree	Most taxi drivers have card machine in car already people are given out about fares all ready and to increase them they will find other ways home with unlicensed drivers like boy racers. Fares are fine the way they are right now it will kill small towns and village taxi its not all about Dublin
I disagree	At IWA we understand the cost of fuel has risen which make it harder for individuals to run a taxi. The knock on affect from this is that while public transport is not accessible to all the cost is put on a person who is trying to survive on very low income and no supplement for extra travel cost
I disagree	Where a decision exists between using public transport bus services or private car, a lower charge should increase demand for taxi services with the benefit of reducing private car usage, reducing congestion, improving the environment, air quality, noise pollution, space allocation etc.
I disagree	I disagree with the 1% of the proposed 12% increase to the fares allowed to provide for the extra cost of facilitating cashless payments. I cannot see any assessment of the cost of accepting cash vs cashless payments, which is likely more expensive now than having a bank process cash.

I disagree	B4 increase The regulator should not compensate the deduction e.g. 'Free-now' of up to 15% of fare; this proposed increase will be further reduced by this commission. Also, The Routing models by Booking agents should be validated to ensure most cost effective and environmentally route is used.
I disagree	This study found that overall, there are significant additional costs faced by individuals with a disability which are currently not met by existing programmes or by social welfare payments and that actual costs faced by individuals will severe disabilities on average range from €9,600 - €12,300 per annum and for those with limited disabilities from €8,700 - €10,000 per annum ⁴ . Therefore, taxi fare increases may negatively impact persons with disabilities more than other groups in society. We would strongly encourage further consultation with disabled persons organisations (DPOs) and persons with disabilities on the matter of taxi fares. In the absence of the mobility allowance, this increase in fares may result in increased social isolation, deprivation, and health impacts for persons with disabilities in Ireland.

Submissions with Commentary	
Opinion	Commentary
No clear position	I'm less concerned with the maximum fare than the unofficial minimum fare. Very often taxis in Dublin city will simply refuse to take a fare under €20 despite that being an unsafe 30-40 min walk in the dark for the consumer. I shouldn't have to bribe taxi drivers to get to Cabra safely from town
No clear position	If justification for any increase is based on increased operational costs, this ties the NTA to a justified decrease to fares, should these costs reduce at the next review. I don't believe this to be a sound course and would prefer the recommendation be based on an increased standard of service etc.
No clear position	Unsure what the reason for raising fees are - I wouldn't be so opposed if the service we got in return was on a par. Currently taxi drivers can and do reject fares because they aren't far enough/are too far, cancel pre-bookings, reject fares when being paid by card.
No clear position	I do believe that a rise in the taxi fare might make the public, look for a cheaper mode of transportation and be a loss to the taxi industry
No clear position	I don't agree with it but I understand it (given the current petrol/diesel pricing).
No clear position	I'm unsure, as an increasing number of Taxi's are 100% electric cars. A significant reduction in fuel costs (for want of a better word), and maintenance and servicing costs benefits the operator. This cost reduction is not being passed on to customers. Must be a factor in reviewing the fare increase
No clear position	I think you are making the public think there will be a massive jump in prices while on other news you are reducing public transports fares
No clear position	Would be better if we get some discount schemes on fuel and other taxi expenses etc.
No clear position	I do agree the raise of fares, but we need to understand that the taxi fares in Ireland are expensive as they are. My question is if the fares will be even higher, who would want to use a taxi? I think taxi drivers should get some sort of deal on fuel/insurance.
No clear position	The issues regarding increased fares will have no impact on An Garda Síochána from a roads policing perspective.

Letter to the Advisory Committee on Small Public Service Vehicles



Mr Con O'Donohue
Chairman, Advisory Committee on Small Public Service Vehicles
National Transport Authority
Dun Scéine
Harcourt Lane
Dublin 2

April 25, 2022

Taxi Public Consultations 2022

Dear Chair,

The National Transport Authority (the "Authority") has responsibility for the regulation of small public service vehicles, including taxis and wheelchair accessible taxis.

1. National Maximum Taxi Fare Review

Pursuant to Section 24 of the Taxi Regulation Act 2013, the Authority proposes to make an order ("maximum fares order") fixing the maximum fares that may be charged by a driver of a taxi. Under the above-referenced Section 24, the Authority is required to consult with the Legal Metrology Service. Please find attached a copy of the proposed maximum fares order.

To assist in understanding the proposed changes, the current maximum taxi fare structure is shown in the table below:

	Standard Rate (08.00h – 20.00h)	Premium Rate (20.00h – 08.00h) & Sundays & Public Holidays*
Initial Charge Distance Allowance = 500 metres Time Allowance = 85 seconds	€3.80	€4.20
Tariff A (up to 15 km or 43 mins)	€1.14 per km or €0.40 per min	€1.45 per km or €0.51 per min
Tariff B (over 15km or 43 mins)	€1.50 per km or €0.53 per min	€1.80 per km or €0.64 per min

*A special premium rate is proposed to apply between Christmas Eve 20.00h to St. Stephen's Day 08.00h and New Year's Eve 20.00h to New Year's Day 08.00h. During these periods it is proposed that the Premium Rate applies with an additional 25% added to Tariff A and Tariff B.



It is proposed to increase the Initial Charge and the Tariffs by 12%.

The table below represents the proposed amendments set out in tabular form:

	Standard Rate (08.00h – 20.00h)	Premium Rate (20.00h – 08.00h) & Sundays & Public Holidays*
Initial Charge Distance Allowance = 500 metres Time Allowance = 85 seconds	€4.20	€4.80
Tariff A (up to 15 km or 43 mins)	€1.30 per km or €0.46 per min	€1.71 per km or €0.60 per min
Tariff B (over 15km or 43 mins)	€1.65 per km or €0.58 per min	€2.00 per km or €0.71 per min

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Should the Board of the NTA approve a new maximum fares order, we would anticipate that the commencement of same would be late summer 2022.

2. Small Public Service Vehicle (Cashless Payment Facility) Regulations

This proposal for a Cashless Payment Facility Regulation concerns only the fleet of taxis in Ireland, which makes up 84 per cent of the total SPSV fleet. Hackneys and limousines are excluded from this proposal being pre-booked vehicles, where payment can be made prior to the journey as the fares are agreed in advance rather than calculated in real time on a taximeter.

Providing cashless payment options in each taxi aligns with Government policy as set out in the National Payments Plan 2013 and aligns with the actions or stated intent of most taxi drivers in recent years but particularly strongly since the advent of Covid-19. A commencement date aligned to that of the Maximum Fares Order would be recommended.

If you have any observations or comments in relation to the above proposals, we would ask that those comments or observations be provided to us on or prior to 12:00pm Friday 27th of May 2022.

Yours sincerely,

PP:

Wendy Thompson

Director of Transport Regulation

Letter to Legal Metrology Service, NSAI

Mr Paul Turner
Legal Metrology Service
National Standards Authority of Ireland
1 Swift Square
Northwood
Santry
Dublin 9
April 25, 2022

Taxi Public Consultations 2022

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Yours sincerely,

PP. 

Wendy Thompson

Director of Transport Regulation

*Advisory Committee on Small
Public Service Vehicles
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin 2
D02 WT20*

Ms. Wendy Thompson
Director of Public Transport Regulation
National Transport Authority
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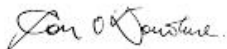
27 May 2022

Re: Draft Taxi Regulation (Maximum Fares) Order 2022.

Dear Wendy,

I refer to the above and advise you that the Advisory Committee on Small Public Service Vehicles has considered the draft Regulations and is in favour of the proposed changes in relation to “maximum fares”.

Yours sincerely,



Con O'Donohue
Chairperson
Advisory Committee on Small Public Service Vehicles



National Transport Authority
Harcourt Lane
Dublin 2
D02 WT20

12th May 2022

Re: Proposed Maximum Fares for Taxis

Dear Wendy,

Legal Metrology have conducted a review of the proposed maximum fares for taxis 2022.

For clarity with taximeters manufacturers/installers who write the software programs, we suggest that Tariff Description (Standard, Premium, Christmas & New Year) are used as was the case in previous technical guidelines. The approach of using S, P and C in the 2022 technical guidelines may lead to confusion amongst the taximeter manufacturers/installers.

We note the proposed date of the 1st September 2022 for the implementation of the new maximum fares for taxis. We are currently working with our Authorised Verifier, Applus to ensure optimum service delivery throughout the fare changeover period.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Paul Turner".

Paul Turner
Manager
NSAI Legal Metrology

Údarás Náisiúnta Iompair
Dún Scéine, Lána Fhearchair
Baile Átha Cliath 2, D02 WT20

National Transport Authority
Dún Scéine, Harcourt Lane
Dublin 2, D02 WT20

