

Regulatory Consultation Report

Public Consultation on Draft Small Public
Service Vehicle (Emergency Measure COVID-
19) (Expired Licence) Regulations 2021

This report details the following in
relation to the Regulatory
Consultation on Covid-19
Emergency Measures:

- NTA's Statutory
Responsibility
- Background
- Consultation Overview
- Submissions



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1. Introduction

1.1 NTA and Regulatory Function

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.

NTA's responsibility for the regulation of the SPSV industry includes the setting of vehicle licence durations, under the powers set out at section 7, *Licensing regulations*, of the Taxi Regulation Acts 2013 & 2016:

“(1) The Authority may make regulations (“licensing regulations”) in relation to the licensing of—

(a) small public service vehicles,

(b) drivers of small public service vehicles, and

(c) services involving small public service vehicles (including dispatch operators).

(2) Regulations under this section may in particular and without prejudice to the generality of subsection (1) provide for all or any of the following:

(i) the period of validity of a licence;”

1.2 Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021

To assist the SPSV industry, which has been decimated by the COVID-19 pandemic and to retain a supply of SPSVs for the travelling public nationwide in the future, NTA brought a proposal to public consultation to increase the current 12 month period to 24 months for those licences in inactive status. This proposal would result in a permanent amendment and is expected to encourage more operators to remain available for licensing and stay within the industry pending a return to normal market operation.

As at 30 June 2021, the SPSV fleet comprised 18,966 taxis, hackneys and limousines in active status (down from 21,235 as at 31 March 2020) and 2,770 in inactive licence status (i.e. eligible to be replaced within 12 months). The Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specify, at regulation 17, that the duration that a taxi, hackney or limousine licence may lie in an inactive state capable of reactivation is a period of up to 12 months.

1.3 Additional Consultation

In addition, the NTA has proposed a further exceptional COVID-19 provision, the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021, in relation to the waiving of SPSV licensing fees.


The purpose of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Fees) Regulations 2021 is to give effect to a 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 2022. 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.

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) (Expired Licence) Regulations 2021 only.

1.4 Structure of this Report

The structure of this report is as follows:

- Section 2 outlines the current regulation on SPSV licensing fees (Regulation 17 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015);
 - Section 3 outlines the public consultation overview;
 - Section 4 outlines the submissions made; and
 - Appendix A provides a copy of the submissions
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2. Background

2.1 Regulation 17 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015

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 period within which an application for the renewal of the licence has to be made before the expiry of the existing licence.

Regulation 17 to the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specifies that NTA may approve an application by the holder of an expired SPSV licence for a replacement of the expired licence provided that the application is made within twelve months of the expiry of the licence.

“The Authority may approve an application [...] provided that [...] the application is made to the Authority on or before the date falling twelve months after the date of expiry of the licence...”

2.2 Purpose of Proposal

The purpose of the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021 is to double the period (to 24 months) that taxi, hackney and limousine licences may rest in inactive status after expiry prior to losing the capacity to be replaced. 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. It is not intended that this amendment will be time-bound.

Currently SPSV licences must be replaced within 12 months of the licence entering an expired status. Should the proposed measure be introduced into law, an SPSV licence may rest in expired status for a period of 24 months, after which it can no longer be replaced. This is a permanent amendment to the current Regulations and, as such, benefits can be availed of by all SPSV licence holders.

As part of this assistance package, SPSV Motor Tax and initial NCT fees will also be funded by the State for a 12 month period.

3. Consultation Overview

3.1 Online Submission Form

On 18 June 2021, NTA published the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021, together with the information detailed in section 2 of this report, on the public consultation section of NTA's website. Also on that day, a text message was issued to 17,369¹ SPSV vehicle licence holders notifying them of the public consultation.

Representations on the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021 were invited from any interested parties via the submission form on NTA's website. The period of the consultation ran from 18 June 2021 to 9 July 2021 inclusive. NTA also consulted directly with the Department of Transport and the Advisory Committee on SPSVs.

A total of 633 submissions were received during the consultation process. All submissions received have been referenced in this report.

Submissions were received via an online survey published by NTA on its website. The online survey contained four response fields:

- Name
- Email address
- 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.
- Other comments (which was a free-text field, restricted to 300 words).

¹ This figure is lower than the total number of SPSV vehicle licences as many individuals/companies hold a number of vehicle licences and received a single notification.

Online Submission Form - Example

Draft Regulation

[Draft Small Public Service Vehicle \(Emergency Measure COVID-19\) Regulations 2021](#)

Your Name (required)

Your Email (required)

Opinion

Comments (max 300 chars)

Submit

3.2 Reporting

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

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 547 responses for coding and analysis.

Identifications of Trends/Themes

An initial analysis was undertaken to identify the common themes emerging and matters raised within the free-text comments.

Data coding

All submissions were read, interpreted and coded against the themes that emerged following a review of the submissions.

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, but it is noted that while most respondents were fairly clear in presenting their views, some submissions did contain a degree of ambiguity.

4. Submissions

Introduction

Following the cleansing of duplicate submissions a total of 547 people responded to the public consultation on Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021.

4.1 Overall Opinion

The vast majority of respondents (93%; n=510) agreed with the proposed amendment to the regulation and a small minority (7%; n=37) disagreed.

Opinion	Number of Respondents	% of Respondents
Agree	510	93%
Disagree*	37	7%
Total	547	100%

**On reviewing the submissions it was noted that 19 of the 37 respondents who selected 'disagree' when completing the online submission form, agree in principle with the proposed regulations.*

4.2 Additional Commentary

Over one-third of respondents overall (39%; n=156) provided additional comments alongside their view of the proposed amendment while over half (61%, n=239) did not.

Additional Commentary		
Included Commentary	258	47%
Did Not Included Commentary	289	53%
Total	547	100%

4.3 Matters Raised by All Respondents

The table below illustrates the themes and matters raised by all respondents from the 258 respondents who provided additional comments.

Themes/Additional Commentary	Agree	Disagree	Total
General Comment	152	7	159
Maximum Permissible Age	75	2	77
Positive Feedback	44	0	44
Personal Financial Circumstances	36	4	40
Licensing Fees	14	3	17
Renewal Period	11	0	11
Finance Package	7	3	10
Insurance Costs	7	1	8
Transferability / Buy Back Scheme	10	0	10
Other	9	2	11
Totals	365	22	387

4.4 Key Themes – Respondents who Agreed

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

Themes/Additional Commentary	Agree
General Comment	152

Maximum Permissible Age	75
Positive Feedback	44
Personal Financial Circumstances	36
Licensing Fees	14
Renewal Period	11
Finance Package	7
Insurance Costs	7
Transferability/ Buy Back Scheme	10
Other	9
Totals	365

Key observations are:

- The majority of commentary that accompanied agree submissions was categorised as general commentary with some respondents noting that the proposal was timely considering the current circumstances. Other respondents included queries within their submissions in relation to their SPSV licences and personal circumstances, however it was noted on the consultation web page that queries would not be responded to on an individual basis.
- A large portion of the comments included reference to the Maximum Permissible Age and called for further extensions in this regard with some respondents stating their vehicle was due to reach its end of life in 2022.
- A notable proportion of respondents provided positive feedback within their commentary, at times displaying gratitude for the efforts being made in support of the industry.
- Personal financial circumstances were also included within commentary which varied from mentions of supports such as the pandemic unemployment payment to repayment, a reduction in income owed to lack of demand, the repayment of loads and the difficulty in sourcing finance.
- Some respondents cited the cost of insurance being one of the main running costs, especially so when they ceased/reduced operation.
- A small number of respondents referenced change of vehicle fees or indicated that licensing fees should be waived, perhaps in reference to the separate consultation on the waiving of fees for 2022.
- Some respondents stated they believed the extension of the expired licence period should be greater than twenty-four months. Suggestions ranged from 2-5 years with one respondent calling for no limit on the expired licence replacement period.
- A small number of respondents made reference to financial support packages, insurance costs, buy back schemes, licence transferability, private hire vehicles and grants.

4.5 Key Themes – Disagreed

The table below illustrates the number of occurrences by theme of respondents who provided commentary.

Themes/Additional Commentary	Disagree
General Comment	7
Personal Financial Circumstances	4
Licensing Fees	3
Finance Package	3
Other	5
Totals	22

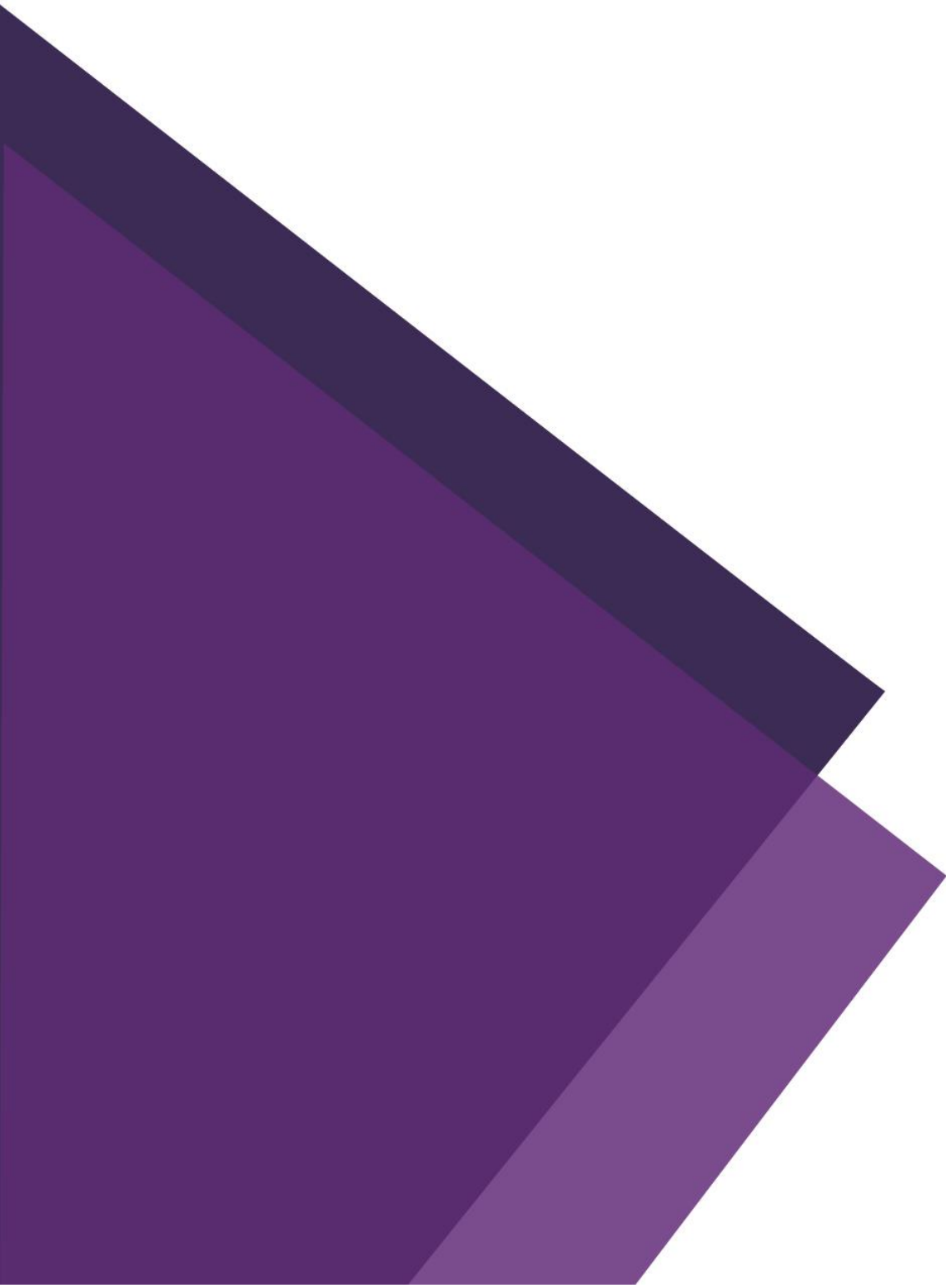
Key observations are:

- Similarly to the above the majority of commentary that accompanied disagree submissions could be categorised as general commentary.
- Personal financial circumstances and a finance package were also cited by some respondents that disagreed with the proposal.
- A small number of respondents made reference to SPSV licensing fees and Maximum Permissible Age.

4.6 Recommendation

Given the overwhelming percentage of agreement with the Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021, it would appear this proposal would be of substantial benefit to SPSV industry members considering the continued adverse impact of the COVID-19 pandemic. In addition, as the proposal is not once which is time-bound, SPSV licence holders set to benefit from the introduction of the proposed regulations post pandemic.

Also taking into consideration the support of both Minister Ryan and the Department of Transport it is recommended that this proposal is approved by the NTA Board.



Appendix A

Submissions with Commentary	
Opinion	Commentary
AGREE	Good move.
AGREE	Will untaxed taxis be backdated?
AGREE	Of course I agree as would any normal person. Why it has to go to public consultation is beyond me. Just more red tape rubbish
AGREE	Good job, thanks.
AGREE	I think this is a great idea as we are really struggling out here and any assistance would be greatly appreciated.
AGREE	I agree
	I agree with the draft regulation and also would suggest that NTA should introduce a licence buy back scheme to allow those that wants out of the business an easy exit.
AGREE	Thanks.
AGREE	Does this mean that I can re-apply for my spsv license using my existing 142-D car up to two years of the expiry date of my license. Thanks. Declan
AGREE	Please consider extending the vehicle age limit as this would be more helpfull to working Drivers. Please consider extending the vehicle age limit also for the same period.
AGREE	Hi while these new measures are very welcome,my car is up for replacing January 2022, is the end of life period being extended ????
AGREE	Would also be a help if the 12 month NCT for taxis apply to cars over the 10 years as well. As the mileage on any taxi working now is well below the average.
AGREE	Pleased the period is being extended, it's very positive for the industry that the regulator has shown this understanding and flexibility, fostering better relationships between all interested parties.
AGREE	I agree with these measures as part of an overall package of measures including the moratorium on future licenses as well as a buy back scheme to facilitate former drivers exit the industry
	I agree with the regulation.
AGREE	We need this to keep out plate's allive.
AGREE	Increase max age of vehicle to 15years
AGREE	I believe and I have suggested it previously in a submission, that it should be possible to renew an expired licence at any stage. A persons circumstance can change which may prevent a renewal now but may allow it in the future. Alternatively buy back licences to give people their money back. Thanks

AGREE	I agree with the extension from 12 month to 14 month. I'd like to see the council buy back licences for people who would like to exit the industry, for the amount they were sold at by the council, in my case 5000 old Irish punts or about 6350eur the year 2000
AGREE	Its necessary as the taxi industry has been decimated, thanks
AGREE	I would like to see the 9 years rule be extended it would cost the government no money at all
AGREE	Every thing helps in these times
AGREE	Cars should be put back to the 15 year rule and not 10 years
AGREE	Good idea
AGREE	It would be great to make itiffucial ASAP as this is the second year I had to renew my licence with no business in sight. Please speed it up!!
AGREE	What about increasing the year of the car to 15 years
AGREE	As we ask for
AGREE	It all helps
AGREE	I agree with the extention of the expiry date.
AGREE	It's currently difficult, for us to access any loans to replace our vehicles.
AGREE	I recently had an accident through no fault of my own, third party accepted liability. I had to buy a new car and recently booked my new car for suitability test, it has since passed but I was charged €195 euro, is this correct or should it have been waived. Thank you for your time.
AGREE	It's fair because the pandemic hit the industry too bad
AGREE	I think this is a sensible step to take considering the uncertainty we all face.
AGREE	I also think licence should be extended to 15 years old as long as it passes NCT; Yes should be doubled. Also as long as car passes NCT it should be allowed without age limit
AGREE	I agree with draft regulation cause I was affected by covid-19 as well, and have been unable to renew. My plate number, 40995 expired during lockdown, and I was refused renewal
AGREE	I haven't been working as a taxi driver since March 2020. I've had to get another job to make ends meet but I would like to return to the taxi if it was financially viable. So this extended period would give me time to do that.
AGREE	It may well take that long for some operators to ge back on their feet
AGREE	I as I said agree with Extending the period from 12 months to 24 months, as I have not had any income from the SPSV (Avenue)
AGREE	It would be a big help and extending the 10-year rule to because I love to stay in job driving my Taxi If you don't extend a 10 year rule I won't be able to keep in the business
AGREE	Every little bit helps

AGREE	It is a welcoming development especially in this difficult and challenging period of Covid 19 pandemic.
AGREE	It's a welcome development
AGREE	I totally agree with any proposal to assist the taxi industry at the moment but i also feel that this alone is not enough.in paticular where the age of the vehicle is going to put enormous financial stress on drivers including myself so i would hope something can be done with regard to this matter.
AGREE	<p>From personal experience extending the time to 24 months makes total sense</p> <p>Between 2015 and 2018 I had to keep my license active while recovering from a serious accident so I could keep my license. believe that this is a sensible idea and should be adopted permanently as from personal experience between 2015 and 2018 I had to keep my license active while being off the road due to injury</p> <p>So increasing it to 24 months makes perfect sense as we presently see many operators can't afford it</p>
AGREE	I agree and support this Emergency Measure
AGREE	More funding and access to financial help is needed like hairdresser/beauticians cash fund
AGREE	Period should be extended for a minimum of 5 years
AGREE	There is no mention of extending the age limit of all licences to cover the almost 2 years of inactivity.
AGREE	I agree with draft & would like to recommend inactive period should be at least 3 Years and owner should allowed to sell his licence.
AGREE	Thanks
AGREE	I think it would be right to extend the period from 12 months to 24 months as it give the taxi industry to recover . We will have no tourists here for the rest of 2021 and more than likely it will middle of 2022 before we will see people on our shores again in large volumes.
AGREE	Why has this taken so long to be announced lads?My taxi plate was due to expire in August 21 so I got passed out and paid for PSV insurance and just to reactivate my licence on T37645.I'm still another month away from being fully vaccinated.This delay has caused me a lot of unnecessary hassle.
AGREE	My licence is due for renewal by 23/07/2021. It expired last year. Do i still need to renew it. I dont know exactly when i can return to work at present.
AGREE	Much appreciated. 12 months was just not long enough. Nice to see something positive being done to alleviate the financial burden caused by the pandemic.
AGREE	Also some help with insurance as payed all mine not covered much
AGREE	I'm back driving trucks now and would like to stay doing this for another year or two and not loose my license so 2 years or more would be great

AGREE	I see if you did happen to change your car you will not get any help with renewing your licence you will have to pay for the new car, the forty-five euro because its a first time taxi in your name, and will be charged full price for your licence of one hundred and fifty euro ,this should have been
AGREE	I think this is will be a relief to many of my colleagues.
AGREE	Will help a lot.
AGREE	Assistance really needed in this difficult time.
AGREE	That relieves a bit of stress ,
AGREE	X
AGREE	It's a good idea. It's a logical decision.
AGREE	Badly need help
AGREE	Agree
AGREE	I agree with this. Thanks
AGREE	Extending renewal of lapsed licenses is a great idea,as quite a lot of drivers are not comfortable with returning to work, until mostly everyone has been vaccinated. Any help with fees will also be good,as the "last straw"often breaks the camel's back. Work is also scarce.
AGREE	12mths is not enough time if you are ill and need more than the allocated time provided under current legislation.
AGREE	The legislation regarding the age limits on vehicles needs to be extended and changed, I cannot earn nor borrow enough to fiance a new car. Every taxi needs at least a year extension to the lifespan of their licence age limit, otherwise I will have to leave the taxi business, in which I have worked
AGREE	Two years will help a lot of taxi drivers with expired licences
AGREE	Absolutely!!!! It's a start, we now need to get rid of the 6 month test and licencing particularly for Vintage Cars for Ceremonial use, it's an absolute farce, these cars are doing nothing at the moment, and even in normal times do very little mileage.
AGREE	How about allow us to sell taxi licenses please
AGREE	Why isn't the sealing of meters not free for the same period.
AGREE	Great idea especially with covid 19
AGREE	Id like to point out tho,as I was mislead again,ive now since just NCTd my vehicle at my own expense.Is there a way of claiming back the fee? I've also had to incur the expense of meter sealing.Surely there is a logical reason to wave this fee also.ive other concerns Id like to address with the NTA!
AGREE	Great cheers
AGREE	We are in unusual circumstances
AGREE	It's essential that my vehicle which has to be changed on 6th January next be extended for a further 12 months in order for me to finance a new car. Thanks

AGREE	It would be most helpful both financially and logical given the current situation that we are still operating in. I would like to see this proposal issued sooner rather than later .Thank you
AGREE	I agree
AGREE	This would be a very welcome and intelligent approach to the regulations, given the current crisis
AGREE	Being able to lapse a licence for an additional year won't assist licence holders to get back on the road,extending the life of a vehicle would be of better assistance and would enable drivers to grow their finances to change vehicle,this only helps MPO's not single plate holders.
AGREE	This will help taxi drivers stabilize after the covid 19 pandemic
AGREE	It definitely should be extended to 24 months I am a taxi driver and I can not get finance any were to replace car this would be great news and help me a lot to hold on to my taxi plate thank you
AGREE	That's good news I'm happy
AGREE	Yes I agree it would give driver a chance to get back on there feet
AGREE	The draft regulation will kick the can further down the road.I personally want out of the industry as soul destroying and I've applied for jobs as even before covid19 it was getting bad .Time to look at new pastures and get away from a underpaid job with to many expenses.Im seeking new career now.
AGREE	I agree
AGREE	It gives drivers a time to access demand for business within the taxi service and probable income
AGREE	This is a must that we have an extension as the economic impact on the taxi industry means that I could not renew my SPSV licence due to a lack of work & the ability to earn a living due to COVID 19. Please extend the 12 months to 24 months for expired licences.
AGREE	One year grace given to those drivers that supposed to have changed their cars this year HAS to be extended to all existing or active car licences. I changed my car last year and I couldn't work throughout the year. It happened to many divers like that. One year validity extension on our cars please
AGREE	I would also like to see an extension on the age at which I must change my car.I will have to change next year, and the car is perfect, and after the last 18 months, it will be impossible to raise the money.
AGREE	We need all the help we can get!
AGREE	My taxi is 10 years old in August 2022. If I have not been working for over a year due to covid how am I expected to afford a car come next year? Banks do not lend and I have no opportunity to save money. Is there going to be grants? Or will ye just give all taxi drivers an extra 2 years extension?
AGREE	Thank you
AGREE	Excellent amendment because it will help the owners of the license reorganised.

AGREE	The 9 year rule should be extended across the whole fleet by 2 years to allow drivers get some financial reward from their vehicles that have been parked up or have reduced work done because of the lack of customers during the lock down and restrictions
AGREE	I know the waive the fees will cost the state. But there should be another amendment vehicle age should be kept 15 years rather than 10/11 years.because of current economic situations of the state and businesses is not good.increasing age of the vehicle will cost nothing for state .
AGREE	I feel because we have lost at least 18 months of business and the fact that I have bought my car over a four year period that an extension of the age limit of spsv should be extended for all vehicles in the fleet irresspective of when the licence expires.
AGREE	I think it would be a very helpful change in these challenging times.
AGREE	Any help is appreciated after being out of work since March '20. My car has not been in service for 15 months and a few more to come. What would really help the industry would be not having to renew cars that were out of service at 10 years old. An extension of 2 years would really help the industry
AGREE	It makes me cringe that your organization has to put this to public consultation when the dog on the street knows the industry has been destroyed, so cease this time wasting, justification of your salary and abolish the 10yr rule so we can make up for the last 2,yrs! Totally vision less and incompet
AGREE	Wat about extending the age of the vehicle two 15 years as some of the other public transport is well over their 30 years old like the tourist buses and the train services and some of the city buses and country as well tank you
AGREE	What about extending the life of all vehicles by one year also. I am 14 months out of work my car reaches 10 yrs next may no time to get money together for new vehicle.
AGREE	They should be maintained even after covid19. Taxi business is completely down. Very hard to put food on the table.
AGREE	It makes sense to assist drivers through these times
AGREE	Should have been introduced long before nowadays
AGREE	The biggest issue for taxi drivers is the 9 year rule on vehicles. I am left with no option but to stay on social welfare as my vehicle is due to be changed because of this rule, I am not in a position to borrow due to having no income. This matter needs urgent attention.
AGREE	Could the Committe please take a serious look at the age limit on Current taxis. As most drivers are on PUP or just making ends meet. It is impossible to get finance in a new vehicle, and put undue stress on drivers already not doing to well financially. Thank you
AGREE	All taxis should also be allowed to be at least 15 years of age, no cost to taxpayer no brainer

AGREE	I would like to suggest that all licence holders be notified when their licence expires and that they get a notification when of the date they can renew with out paying and this should cover change of vehicle ie new suitability inspection fee
AGREE	I also think their should be an extension to the nine year ruling on vehicles not only by a year in order to help the taxi industrie but by a further five to six years thank you
AGREE	I totally agree with this. I lost my own license previously because the inactive period was reduced from 5 years to 1. It was ridiculous that it was changed from 5 to 1 and achieved absolutely nothing
AGREE	Sick to me teeth of this we needed a 15 year rule on saloon plates were 16 months telling the nta this
AGREE	Vehicle 10Year rule needs to be extended to give drivers a chance to recoup after the pandemic.
AGREE	Keep up the good work thanks
AGREE	Very helpful an shows that we matter. Appreciated
AGREE	Absolutely brilliant any help is appreciated.
AGREE	I feel let down bye NTA .no support..since covid a lot of people died lots of people will have long term sickness..the 9 year Rule .will put me out of business I just can't afford new car .3 weeks ago I lost my dear friend finbar O sullavan a taxi man suicide. chack it up on your data. money problem
AGREE	As it is the very least that could be done. This offer is clear insult to the men and women supporting families within this industry. It is now abundantly clear that there is an 'anti taxi sentiment within the mindset of the NTA & Dept of transport. Shame on you.
AGREE	Any thing that can help the taxi drivers I will agree one thing that needs to be done is is the extension of the life of the car it should be 13 years there was one car last week passed an NCT test and it's 91 years old and and the national Transport Authority wants us to take her car off the road
AGREE	I need answers if you were to reply it would sort out for me were I stand as to were I am going to make a living from to feed and provide for my family . My licence was due to expire at27 January 2021 as far as I know this was extended to 27 January 2022 so are you now trying to tell me my licence will now will be extended to 27 January 2023 please let me know as I am confused as to were I stand
AGREE	Could you please consider the limit age for taxi wheelchair and to issue 2 years licence not one year because we really have spend a lot of money to put on the road the wheelchair taxis and I'm one of the taxi drivers that I haven't got a penny from the NTA I have pay all from my pocket reg: 12G387

AGREE	Please be patient with drivers out der this is der toughist time ever
AGREE	I agree with draft regulation
AGREE	Financial assistance should also be made available for those operators that must change their vehicle on it approaching it age limit of ten years. Age limits should also be extended.
AGREE	We all need as much help as possible in these tough times.
AGREE	Badly needed to help drivers stay in the industry
AGREE	this will only suit multiple plate holders why can't you extend the life of the vehicle from 10 to 15 years instead of forcing full time drivers on the dole after 30 years service this is a wrong decision
AGREE	This is a good way to assist taxi drivers that might be struggling financially to return to work after covid 19.
AGREE	The industry is on its knees.
AGREE	No visitors no work no insurance relief. In 40 years it's never been so bad.
AGREE	Also scrapping ten year rule. Maybe moving to 15 years. Once vehicles are SGS and NCT compliant. They should decide what conditions vehicles are in . Only an opinion.
AGREE	I have entered expired state with my spsv vehicle licence and could really do with at least another 12 month extension.
AGREE	Regards Mark Shanley.
AGREE	Currently my spsv licence has expired(34845) and my car is over the 9 years(2011). I'm not in receipt of any assistance and Currently cannot afford to renew. Please advise me of my options. Any assistance in this would be greatly appreciated.
AGREE	I think that this should be extended beyond 2 years to 5 years
AGREE	we currently have 3 inactive licences, we do not know when we will see a resumption of business solely due to COVID and the collapse of international travel. limousine license cannot offer same services as hackney or taxi due to our insurance not covering similar type of services.
AGREE	I fully agree with this draft
AGREE	Yes I agree with both draft regulations. Also as a SPSV operator I am becoming extremely worried (Due to COVID) on the affordability of trying to buy a new vehicle next year as my (well looked after) 2012 Ford Mondeo is To be replaced. Can you please direct me to appeal this. Thanks
AGREE	More needed by government
AGREE	It's about time and overdue that some decent packages are being looked into
AGREE	Because it would be a good way to start to help drivers get financial assistance back into their ongoing expenses
AGREE	i am trying to get back on road and so hard , get new car start from scratch , can't get lends of Any1 because on pup payment , the industry is so bad out there , and help would be great for me ta

AGREE	It would have been v unfair if my licence had of expired after 12 months, through no fault of my own, after all i had to buy it with my hard earned money
AGREE	Hi To whom it may concern Please explain in plain English what this means that Taxi lience holders are entitled to . Regards David Reddin
AGREE	To extend to 24 months yes
AGREE	I think all fees should be waved till 2022
AGREE	It is great.
AGREE	Give drivers some extra years on cars; This only benefits multi plate owners so no
AGREE	I dont agree there should be an increase of another few yrs on age limit .if the car has Nct then it is Roadworthy .
AGREE	Yes I think this would be a great help.
AGREE	This is a good move , this industry needs a lot more attention as this industry is the most affected directly due to Covid 19 , needs to bring more and more options to make things easy for the license holders
AGREE	This is certainly a good step. Could have been done more for losing out a lot of money during these difficult times.Still whatever is being offered I am grateful
AGREE	Yes, this is a good idea.
AGREE	I think that it should be extended more to facilitate drivers like myself who must change vehicle and cannot afford to as all my capital has been exhausted by the pandemic so I will have to get work elsewhere to save to by a car suitable and afford insurance and in reality won't have change from
AGREE	Also age limit on taxi fleet should be extended
AGREE	Taxi drivers need all the help they can Get with the cost. And this will ease the pressure
AGREE	It is a must to extend the vehicle age limit to at least 11 (12 or 13 would be better)years across the board for all taxis, and review it in 2023. Finance will be severely hard to get, given the financial situations most taxi operators find themselves in. It is the single biggest issue for so many
AGREE	Yes i think it would be a fantastic help as I a Hackney myself spent 6 months out of work due to covid.

	In the current electoral vehicle grant a 7 year old car or older qualifies for the scrappage scheme if is attached to a 10 year licence. But if the car is attached to a 15 year licence it must be over 12 years old to qualify for the grant.
AGREE	Surely this is a mistake.
AGREE	This should definitely be the case nobody knows the future 24 months is a lot better then 12 months in my opinion it's a start in the right direction we also should be able to sale our plates back if getting out of the industry should not have taken from us in the first place.
AGREE	That's good news
AGREE	I think it's good idea and also for wheelchair taxi lience to be able to change to regular taxi lience
AGREE	Extend car age replacing the to 15 years
AGREE	Business is very slow I think an extension of one more year for cars is needed also
AGREE	This is a good idea many drivers have been off the road for over a year
AGREE	Very good decision
AGREE	Please extend a taxi age which is dead in early next year. Thanks
AGREE	It is just right at this difficult time.
AGREE	It is necessary to review also the standing periods of 10 and 15 years.this has been advised by the various unions.i suggest that nta needs to set a date in the next few years for all taxis at 10 years.
AGREE	I think it should be extended to 36 months from the period of expired status.
AGREE	It's good for NTA and SPSV license holders,because since the pandemic we should not got any passenger's in our county Offaly,second things is that NTA suppose to extend the vehicles for TAXI to 15years instead of 10years to operate, and NTA suppose to mandatory for insurance to reduce their charges
AGREE	I think its a great idea by the NTA to give people an extre 12 months to reactivate their licence.
AGREE	I was offered full time employment by a company in March in which I had to take because of the uncertainty surrounding the taxi industry going forward,I would love to let my licience hibernate for a while so the industry can recover and give me time to contemplate my future .
AGREE	Anything that helps the industry to get back on its feet is a positiv
AGREE	I think the taxi industry & drivers need all the backing & support necessary at moment to help it deliver a better & safer service
AGREE	My licence is due for renewal before end of August. Due to the impact of Covid on business I will not be renewing it at this time but I would like the option of late renewal to be extended to 24 months as I do not want the license to be extinguished.

AGREE	Legislations appear to come in "drips", giving the impression that the date of enactment or application is designed to benefit a strata of the SPSV Population, as it prevents planning and screens others from benefit. The €250 Driver License Renewal fee should be suspended for 2021-2022 period. Tnx.
AGREE	Would like to see a 2year extension to the 10 year car change rule . Thank you
AGREE	Good idea
AGREE	The 24 month inactive period for renewal should be put in place permanently going forward.
AGREE	I think it is a good step and will give the license holder a lot of time to reflect on things.
AGREE	All taxis should be extended to 12 year rule ,it's not fair .
AGREE	It should be free till 2025
AGREE	I completely agree with draft in Covid situation.
AGREE	For once the NTA have put taxi drivers first! I also strongly believe that the NTA should revisit the 9 yr rule for taxi vehicles. If a vehicle has valid NCT and passes a suitability test there should be no reason to replace a perfectly good car?
AGREE	What about the most expensive part of our industry (INSURANCE) to keep the license active we must have insurance and the insurance cost remains the same whether we are operating or not. Please deal with INSURANCE as we now know they are not being honest with us
AGREE	I wanted to reach out to in-regards to the expiration of my Vehicle license. I was late to renew my Vehicle license (53244) due to COVID situation. I will be so thank full to you if you agree my license to be renewed. Thanks
AGREE	Yes I would like to see it Extend As a lot of drivers are finding it very financially difficult to get finance for new vehicles as the banks are not given money to taxi driver and is in the industry
AGREE	I agree with the new draft regulation for 2 years on the extension of the liscense as it is terrible the way things are at the moment over covid and no one has the money so it needs to be extended for 2 years. Thanking you Thomas Daly I agree to 24 months as for people have to try get back on their feet . Yours Sincerely Thomas Daly .
AGREE	I agree that the licence expire time should be extended to 24 months.
AGREE	Would appreciate my licence being extended
AGREE	I agree with the above funding for the SGS and NCT and motor tax
AGREE	i agree with the draft to extend the licence time
AGREE	On the 2nd March 2020 was my last taxi fare.As I was in receipt of the state Pension e 248.30 I was not entitled to claim The PUC. (e 350). I want to get back to work, only when it's safe(age68) next .so what you are doing is helpful.. Yours James Paul Moran.
AGREE	i wish to put 24 months on my plate

AGREE	There inactive due to covid condition and has become impossible to rent a taxi out
AGREE	This industry needs as much help as possible especially in rural areas where our work is now virtually non existent. Would be highly welcomed in the toughest times I think our industry have ever faced
AGREE	This needs to happen. Every other industry is being helped in these exceptional times
AGREE	Help is needed in the industry
AGREE	It's some help for the existing drivers.
AGREE	There is need for extension
AGREE	Good idea thanks.
AGREE	I want taxi plate to be extended to 24 months
AGREE	It should go back to 5 way it used to be. Let judge give it back. Or implement a buyback policy from drivers.!!
AGREE	The above draft measures would be very beneficial to the taxi industry as the pandemic has had detrimental impact on the earnings of the above and will so in the foreseeable future
AGREE	<p>I totally agree as do other expired licence holders .Firstly I am an night driver and the work simply is not there and secondly the taxi insurance company is asking me for 2,000 euros which I need to renew my licence ,</p> <p>this extension will help tremendously during this pandemic</p>
AGREE	<p>Due to Covid 19 I don't feel safe going back to work(taxi driving)quiet yet. My licence is up in July 2021 and I would like to request another 12 months suspension of my licence.</p> <p>Can someone please email me or contact on 086 1633620 to explain my options.</p> <p>Patrick Lynch</p>

AGREE	<p>This submission of mine needs to count as 44 submissions for my 44 Taxi licences and the same must be for all the multiple Licence holders as this is fully about Licences and not just one individual. I also communicated with you in March this year - see your file. Regards, Tim; Licence T18798. Your consultation on this matter is very welcome. Licence T18703.; This action is badly needed. Should have happened 9 months ago. ; Licence T18571. This action is badly needed - should have happened 9 months ago but better late than never. This submission of mine needs to count as 44 submissions for my 44 Taxi Licences and the same must be for all the multiple Licence holders as this is fully about Licences and not just one individual. I also communicated with you in March this year - see your file. Regards, Tim; Licence T17571. This action is badly needed; Licence T17485. This action is badly needed; Licence T17069. This action is badly needed; This action is badly needed. Licence T16782. This submission of mine needs to count as 44 submissions for my 44 taxi Licenses and the same must be for all the multiple Licence holders as this is fully about licences and not just one individual. I also communicated with you in March this year on this matter - see your file. Regards, Tim Murphy; I agree with an extension and ask that the period be 36 months as the dire situation that started early last year is crushing and continues. I also sent you a submission or two a few months ago Re: this matter. Tim.</p>
AGREE	<p>This would be a really helpful amendment as I found myself in a very stressful situation last February in having to borrow money to buy a car to renew my licence as it was in an expired status and i strongly believe that the age of a car should be at least extended to 12 year's to help drivers more.</p>
AGREE	<p>I paid £5,000 for my taxi plate licence nearly 20 years ago and it is now worth nothing. There is an apparent contradiction in that I could will my taxi plate licence if I died where it would obviously be of some value.,otherwise it dies. Where is the logic in that ?</p>
AGREE	<p>Show some compassion and extend the life of vehicles by 5years to allow drivers to get back on there feet.Cost nothing.</p>
AGREE	<p>I'm looking for additional 12mths. extension for license no. L50532. My business has not recovered since covid and don't have the funds to insure a vehicle for suitability test especially when there's no guarantee of income. Spoken to NTA call ref.653530. Regards</p>
AGREE	<p>The draft regulations are much needed in the taxi industry at this time. My vehicle reaches 10 years of age in February 2022 and I'm put off the road with little chance of financing a new vehicle as I've not worked since March 2020. So at 60 it looks likely I will be unemployed from then on.</p>
AGREE	<p>Period should be equal to the length of the pandemic</p>
AGREE	<p>Whatever measures that make life easier for operators in this industry in this difficult times is commendable</p>
AGREE	<p>Would be of great help at this time</p>

AGREE	I agree with draft of extending to two years down time as I can't see taxi business getting back to normal
AGREE	it is essential help to the Taxi Driver at this hard time.
AGREE	Due to the current spread of the Delta virus and some underlying health issues I would feel very uncomfortable returning to work at present so I agree with the proposed regulation
AGREE	My car expires in January 2022 because of the 10 year rule I cannot afford a new car due to covid I'm hoping that I can get an extension for a year on my car as a taxi
AGREE	I would also like to see age of vehicle extended because when applying for a loan to change your vehicle, last year earnings are distorted due to poor history of earnings
AGREE	I would like the 10 year rule extended to 15 years
AGREE	I think the crappage age of vehicle extension should apply to all license holders as I'm missing out on it by 4 days in 4th January 2022 my current vehicle expires and my current financial situation won't allow me to purchase a replacement car. I do hope this is considered please thanks.
AGREE	Any help is with fees over the coming years is much appreciated.
AGREE	We as taxi men need help with the 9 year rule please extend this and take the pressure off use thanks
AGREE	I have to change my car in February because of 9 year rule and due to hardly working due to pandemic the last year and half I ask for an extension to my vehicle as I will have to go on social welfare as I have no access to funds to change car
AGREE	Any break the Taxi Driver gets is good thing
AGREE	Ten year rule should be scrapped all Taxis should be 15 years age limit
AGREE	The NTA should be doing much more to assist Taxi Drivers during these difficult times due to the covid pandemic
AGREE	Actually it should be extended longer than 2 years as already taxi drivers have lost out on one to one and a half years income and who knows when things will be back to normal.
AGREE	24 months is needed at present because my licence is up 31st jan 22 and this is not the best time to get into debt for me as work is not great yet. But it will be and would like to upgrade my car next year and get back to work then . my licence goes with my car on 31 jan 22..i feel it is not a great time to incur more debt for a younger car right now but will be next yr...hopeful of an extension of 24 mnths as i can buy a car next year and not be forced to pack it in yet F1603/16972

AGREE	This should only be allowed to benefit one license per person. Companies should not be allowed us this as a loophole to store licenses. Proposals don't help drivers already back at work. Age of vehicle needs to be extended. Why were representatives not consulted allowing time to promote consultatio
AGREE	24 months is ok , but it would be better if was 5yrs like before , I know lot of drivers struggling, many finding it hard to get enough money for insurance , I think we will have very tough winter work will be slack once school returns Resturant's will be quiet plus more lockdown, which I hope won't
DISAGREE	The draft should also include an option for the licence to be sold back to the NTA
DISAGREE	<p>The simple method for dealing with renewable taxi lucenses is to re enact the 2013 regulations. Extend all licences to the 15 year age limit.</p> <p>After 10 years all vehicles to be nct'd and visuallly inspected twice a year.</p> <p>There is no money in the taxi business and most people cannot afford to change.</p>
DISAGREE	The biggest help to us would be to extend all vehicles to 15 years woudnt cost use a penny stupid carry on that rule if a car passes the nct should be fit for purpose youse only lookkig after the boys in the motor trade pure joke that rule
DISAGREE	This is aimed at multi plate holders, businesses that rent multiples of taxis to drivers who cannot get finance for their own vehicle or unable to buy a plate. Taxi drivers want an extension to the life of their vehicles, this is the number one issue, why don't you actually listen to us.
DISAGREE	<p>I'm absolutely sickend the way the government and the nta has handled this situation.</p> <p>I've been struggling the last 16 months and now all I'm offered is free NCT road tax and vehicle licence ?</p> <p>Sure I claim all this back doing my tax returns anyway so basically I've been given nothing.</p>
DISAGREE	Too little Too late, the private hire industry has been decimated beyond repair from over regulation and covid was the final nail in the coffin
DISAGREE	Licence extension for vehicles over 10 years is what's needed!
DISAGREE	Allowing plate licences a 2 year period of inactivity whilst drivers with 2012 registration vehicles will be put out of the business due to lack of finance is farcical by the NTA. Loans require guarantors, wheelchair grant requires full borrowing of 35 to 50k.Ears firmly closed NTA.☹️

DISAGREE	I agree with the draft regulations but further regulations need to allow for an aging fleet of taxis. The regulations need to be amended to allow all existing taxi operate up to 12 year's of age as wear and tear is not an issue over the past two years because most taxis are not as busy as in normal
DISAGREE	Please use different terminology (distinguishing expired period from say Final date for renewing). My licence was due for renewal in Nov 20, so I v until Nov 21..?.. or Nov 22..?...) My engine has also seized up cos of Covid inactivity). So does this NTA proposal allow me until Nov 2022..?? Do u mean an extra 12m on d expired 'expired' licence (which would mean 24 months after d date of 'actual' expiry date of active licence. Confusing terminology. Not clear. So please use different terminology. My situation is that my renewal date was last Nov so I must pay €500. My car engine has also seized up
DISAGREE	We are still in a Pandemic!!! Unfair to people who are due for renewal in early 2022 . Considering most cars were off the road for 8 months and more in covid.
DISAGREE	Lapsed license should be renewable up to 2 yrs and longer if driver needs medical treatment also 9 year rule needs to be extended to 15 yrs across fleet
DISAGREE	15 years old for all taxis, with 1 suitability test a year and 1 nct test a year for the 15 year duration, meantime Grants are there for drivers who can afford to change their cars
DISAGREE	Why should I renew my car, licence, and all to do with taxiing and there is no work out there. When others let their licence go out of date and they take up different jobs. We have enough part time drivers out there..
DISAGREE	The most pressing issue for taxi drivers is the 9 year vehicle rule. I cannot afford to borrow to change my vehicle as I am currently in receipt of social welfare payment due to the c19 restrictions. I will now be forced to remain unemployed because of the failure of NTA to address this issue
DISAGREE	Taxi Drivers will not be able to Get car finance because they are getting covid payments mortgages on hold car payments on hold NTA have to bring back 15 year age rule to allow Get back on their feet vital
DISAGREE	I would seriously question why this is needed when late fees have already and can be waived in future. Liam Dunne.
DISAGREE	Let's go back to pre covid
DISAGREE	Back to normal
DISAGREE	What is needed is a two year extension to the last licence date of all spsv. No cost involved but cars not clocking mileage would not be losing life while idle. A friend of mine just bought a tesla, if this continues for another two years, will he only get 8 years as a taxi.

DISAGREE	The draft regulations is irrelevant, injustice and one sided, because we protested that all vehicles be given minimum of 2 years extension, but your obnoxious draft is looking after only 2010 and 2011 regenerations, after all, all the existing vehicles owners (ie Taxi licence owners) are affected.
DISAGREE	An what about the INSURANCE mind is 2 grand taxi drivers got nothing left on the scrap heap as always I'm driving 20 years u so out of touch do u know what if u had a magic wand u still wouldn't get it right so out of touch
DISAGREE	I agree to certain aspects of the draft but my frustration is that you keep putting all this industries as raxi i am not taxis but wedding cars and you people need to get a grip of this WE ARE NOT TAXIS
DISAGREE	Increase maximum age of vehicles to 15years for single plate owners and allow them to continue to work. Thks
DISAGREE	The Draft regulation does nothing to help drivers who are receiving state pension. But they have invested in the business over the years. They have upgrade their cars, Insurance payments, car tax , NCT test , and €250 payment foe 5 year licence . Car loan payments to be met monthly.
DISAGREE	I recieved no support for Ppe. No grant for screens. I still had to pay road tax and nct cost. Keep my car insurance active as it's a high risk for theft. No real assistance to cover costs inc maintain my vehicle to standards required. I got no pup payment or restart grant. All out of my pocket
DISAGREE	My understanding when I purchased my SPSV vehicle licence was that the licence was in my gift to pass on to family member after I retire. I filled in forms to arrange and accommodate this. The pandemic changed my plans and I stopped working as a licence holder. I planned to return to the business?
DISAGREE	Extend the ten year age limit to at least 15 years.
DISAGREE	As a driver with cancer and type2 diabetes I think until the pandemic is under control 1. We should be able to suspend our licence until we are able to return safely to work. 2. Age of the car should also be extended to 11 years for everybody.
DISAGREE	12 months is enough to decide if you wanna keep your licence

DISAGREE	Age of vehicle should be extended to 12 years until 2030 as all drivers were affected by the Pandemic.
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