

Regulatory Consultation Report

Public Consultation on Draft Small Public
Service Vehicle (Emergency Measure COVID-
19) (Maximum Permissible Age) 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



Table of Contents

1	Introduction.....	3
2	Background.....	3
2.1	Pre-COVID Law on Maximum Permissible Age	3
2.2	COVID Emergency Measures relating to Maximum Permissible Age.....	5
3	Status following Regulation	5
4	Proposal	6
5	Consultation Overview.....	7
5.1	Online Submission Form	7
5.2	Reporting	8
6	Submissions	9
6.1	Overall Opinion	9
6.2	Additional Commentary.....	9
6.3	Key Observations.....	10
7	Appendix A - Submissions	11

1 Introduction

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

NTA is responsible for regulation of the small public service vehicle (SPSV) industry in Ireland. As at 30 August, the Small Public Service Vehicle (SPSV) fleet comprised 22,308 taxis, hackneys and limousines in active and inactive licence status.

As part of NTA's regulatory function, and in accordance with Section 20 of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in respect of the type and age of a vehicle which may be used as an SPSV.

Regulation 31 of the Taxi Regulation (Small Public Service Vehicle) Regulations 2015 specifies the "maximum permissible age" limit for a vehicle to operate as an SPSV, i.e. the final operation date of each individual taxi and hackney in the SPSV fleet. This is separate to the small public service vehicle licence, which can have any single suitable vehicle under the maximum permissible age associated with it.

2 Background

2.1 Pre-COVID Law on Maximum Permissible Age

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 20, *Small public service vehicle regulations*, of the Taxi Regulation Acts 2013 & 2016, NTA may make regulations in relation to the maximum permissible age at which vehicles can be licensed as SPSVs before exiting the fleet.

"Small public service vehicle regulations

20. (1) The Authority may make regulations, to be known in this Act as small public service vehicle regulations ("SPSV regulations") in relation to the following:

[...]

(b) the vehicle standards to be complied with regarding the roadworthiness and suitability of a small public service vehicle, including standards relating to the following:

[...]

(ii) the type and age of a vehicle which may be used as a small public service vehicle;”

The legislative intention behind Regulation 31 (Maximum permissible age requirements) of S.I. No. 33/2015 - Taxi Regulation (Small Public Service Vehicle) Regulations 2015 - was to increase vehicle standards and quality within the national taxi and hackney fleet. The limousine licence category is exempt from this Regulation given that such vehicles must be *“evidently suited by reason of its style and condition for the provision of hire services for ceremonial occasions, or for corporate or other prestige purposes”* and also have a much lower mileage than other SPSVs.

In accordance with Regulation 31 where a standard taxi or hackney vehicle licence was first granted before 1 January 2009 and a vehicle was associated with that licence on 1 January 2013, that vehicle can be licensed up to the 15th anniversary of the date of its first registration. In all other cases vehicle standard taxi or hackney can be licensed up to the 10th anniversary of the date of its first registration.

For a wheelchair accessible vehicle associated with a licence on 1 April 2014, there is no maximum age limit. For all other wheelchair accessible taxis and wheelchair accessible hackneys the maximum age limit is 15 years from the date of first registration of the vehicle.

The age of the vehicle is calculated from the exact date on which it was first registered (day, month and year).

“Maximum permissible age requirements

31. (1) Subject to paragraphs (2) and (3), the maximum permissible age of a—

(a) standard taxi, standard hackney or local area hackney is ten years from the date of first registration of the vehicle, and

(b) wheelchair accessible taxi or wheelchair accessible hackney is fifteen years from the date of first registration of the vehicle.

(2) Where a vehicle is associated with a standard taxi licence or standard hackney licence first granted before 1 January 2009 and was associated with such licence on 1 January 2013, the maximum permissible age of such vehicle is fifteen years from the date of first registration of the vehicle.

(3) This Regulation does not apply to—

(a) limousines, or

(b) a wheelchair accessible taxi or wheelchair accessible hackney that is associated with the small public service vehicle licence on 1 April 2014.”

2.2 COVID Emergency Measures relating to Maximum Permissible Age

Following statutory public consultations in 2020 & 2021, NTA enacted three emergency measures to extend the maximum permissible age of taxis and hackneys in response to the enduring adverse economic consequences of the COVID pandemic on the SPSV industry. These Regulations were:

1. The Small Public Service Vehicle (Emergency Measure COVID-19) Regulations 2020 (which concerned taxis and hackneys due to reach their maximum permissible age during the period 13 March 2020 to 31 December 2020 providing a 12 month extension of the maximum permissible age for 763 vehicles) - enacted May 2020;
2. The Small Public Service Vehicle (Emergency Measure COVID-19) (No. 2) Regulations 2020 (which concerned taxis and hackneys due to reach their maximum permissible age during the period 1 January 2021 to 31 December 2021 providing a 12 month extension of the maximum permissible age for a further 1,783 vehicles) - enacted December 2020; and
3. The Small Public Service Vehicle (Emergency Measure Covid-19) Regulations 2021, revoking the above Regulations and extending the period for both to (which concerned the remainder of both cohorts of taxis and hackneys above, providing a 24 and 12 month extension of the maximum permissible age respectively) - enacted May 2021.

These combined consequence of these Regulations was that all taxis and hackneys, with a final operation date during the period 13 March 2020 to 31 December 2021, had their maximum permissible age extended to the same day and month of their original maximum permissible age but in 2022. Thus, no taxi or hackney in the fleet would reach its maximum permissible age until 2022, with a staggered replacement requirement throughout the year.

3 Status following Regulation



Status as at 25 August 2021	24 month MPA Extension		12 month MPA Extension		Availed of Regulatory Benefit
Replaced the vehicle on the licence	322	42%	225	13%	No - 1144 Of which 547 replaced the vehicle, 538 went into inactive status and 59 allowed the licence to terminate
• Licence Current	304		223		
• Licence inactive	18		2		
Entered Inactive Status - up to 24 months	103	14%	435	24%	
Permitted licence to go dead	32	4%	27	2%	Yes -1341
Renewed licence with same vehicle	306	40%	1,035	58%	
• Licence Current	241		1,017		
• Licence inactive	65		18		
Maximum Permissible Age not reached	0	0%	61	3%	61 Outstanding
Total	763	100%	1,783	100%	

4 Proposal

In light of the ongoing nature of the pandemic and concerns regarding the potential impact of the 'Delta variant' on the SPSV industry, NTA proposes to make another enactment in this space, revoking the above Regulations and providing certainty and emergency COVID-19 protection to the owners of the 2,095¹ vehicles due to reach their maximum permissible age during 2022 for the first time, as well as further protection to the owners of the 1,402² vehicles who availed of the previous measures and are now due to reach their amended maximum permissible age in 2022. The vehicles concerned must maintain six monthly roadworthiness and SPSV suitability inspections.

NTA seeks to amend Regulation 31 of the Taxi Regulation (Small Public Service Vehicle) Regulations 2015, Maximum Permissible Age Requirements, such that the 3,497³ currently affected vehicles would remain eligible to be licenced, all other obligations being met, throughout 2022. The amending regulations, the draft Small Public Service Vehicle (Emergency Measure Covid-19) (Maximum Permissible Age) Regulations 2021, would revoke the current Small Public Service Vehicle (Emergency Measure Covid-19) Regulations 2021. They would extend any maximum permissible age reached during the period 13 March 2020 to 31 December 2022 to the same day and month of 2023 (as opposed to 2020, 2021 or 2022).

¹ Figures correct at time of writing but will change daily until the day of regulatory enactment

² Ditto

³ Ditto

The 2,301⁴ vehicles due to reach their original maximum permissible age limit in 2023, as per Regulation 31 of the Taxi Regulation (Small Public Service Vehicle) Regulations 2015, will continue to do so.

Whilst this will cause a small strain on our inspection resources in 2023, if all owners were to avail of this regulatory benefit, and the table above shows that that is not the experience to date, that strain is not insupportable. All relevant vehicles would have to do a renewal inspection which would in this scenario be substituted by the change of vehicle inspection. It will also assist in removing the glut of renewal inspections created in Q3 annually on foot of the three month licence renewal deferral in March 2020 when the inspection centres were closed on public health grounds.

5 Consultation Overview

5.1 Online Submission Form

Following correspondence from the Department of Transport received on 08 July 2021, NTA published a public consultation on the draft Small Public Service Vehicle (Emergency Measure COVID-19) (Maximum Permissible Age) Regulations 2021 on NTA's website on 20 July 2021. Also on that day, a SMS message issued to 17,264⁵ SPSV vehicle licence holders notifying them of this public consultation. Representations were invited from any interested parties via the submission form on NTA's website. The period of the consultation ran from 20 July 2021 to 11 August 2021 inclusive. NTA also consulted directly with the Department of Transport and the Advisory Committee on SPSVs.

A total of 805 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.

⁴ Ditto

⁵ 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.

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

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

5.2 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. 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 712 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.

6 Submissions

Following the cleansing of duplicate submissions a total of 712 people responded to the public consultation on Draft Small Public Service Vehicle (Emergency Measure COVID-19) (Expired Licence) Regulations 2021, together with the Advisory Committee on SPSVs.

6.1 Overall Opinion

The vast majority of respondents (91%; n=651) agreed with the proposed amendment to the regulation and a small minority (9%; n=61) disagreed.

Opinion	Number of Respondents	% of Respondents
Agree	651	91%
Disagree* ⁶	61	9%
Total	712	100%

6.2 Additional Commentary

Almost two-thirds of respondents overall (59%; n=417) provided additional comments alongside their view of the proposed amendment while the remainder (41%, n=295) did not.

Commentary	Number of Respondents	% of Respondents
Included commentary	417	59%
Did not include commentary	295	41%
Total	712	100%

⁶ On reviewing the submissions it was noted that 43 of the 61 respondents who selected 'disagree' when completing the online submission form, agreed in principle with the proposed regulations, whilst requiring enhanced intervention.

6.3 Key Observations

Key observations received in the commentary specific to the regulation and/or COVID were:

- 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 notable proportion of respondents provided positive feedback to NTA within their commentary, at times including gratitude for the efforts being made in support of the industry.
- A number of respondents commented that the maximum permissible age regulations should be increased on a permanent basis and their recommendations ranged from 12 to 15 years. A small number indicated there should be no maximum permissible age if the vehicle passed both the NCT and suitability inspection.
- Personal financial circumstances were also included within commentary which varied from mentions of loss of earnings as a result of the pandemic, to the repayment of loans and difficulty in sourcing finance.
- Insurance costs were cited as being one of the main running costs, especially so when they ceased/reduced operation.
- Some respondents stated that the requirement for NCT and suitability inspections should be on an annual basis, regardless of the age of the vehicle.
- A small number of respondents referenced fees which ranged from NCT costs and licensing fees.

7 Appendix A - Submissions

Submissions	
Opinion	Commentary
Agree	My car is up in January 2022 the 4th. So it's important to me to get another year, if I don't, I won't be able to get finance so I'll be off the road and no Job, So I'll have no option another then sign on to the social welfare.
Agree	12 years cap needed across the entire fleet
Agree	2020 & 2021 are a washout for taxi drivers not giving anyone a chance to save for updating their vehicles, all taxis from 2011 to 2013 should be given extra 2 year's to help them recover and it wouldn't cost the government anything just the stroke of a pen
Agree	Absolutely agree on extension
Agree	Age limit has to go... my car only has 140k on d clock and has to go in 6 months Regards Declan
Agree	Age limit on taxis needs to be extended.
Agree	Age of car should be extended from 9 years to 15 years, as these car,s are roadworthy and pasting suitability, if not they would not past the NCT, suitability, this stops Taxi Drivers from going into Big money loans, which causes Stress and Drivers taking taking there life,s favour of this Draft.
Agree	All car owners should not have to change their car until 2025 as to give them time to recover from their loss of earnings over the last year and half
Agree	all cars should be let go till they are 15years old subject to all rules being followed.
Agree	All great but some financial support specifically for the industry would have been welcome.
Agree	All License Taxi and Hackney and Limousine should be given 2 years longer..and the rules should be across the board for all public Service providers why just SPSV...
Agree	All spsv vehicle that were registered as the spsv before pendamic should be extended to 12 years and it will be fair for all as 2010 car got 2 years extension why not other vehicles
Agree	All taxis have been affected by covid not just some and it will be at least another year or more to a full recovery. All taxis deserve a vehicle extension not just some.
Agree	All taxis operational on march 12 2020 should get an additional 2 years on licence.
Agree	All taxis should be given a 2 year on there 9 year dead line as we have not been able to work

Agree	All taxis should get 2 year age extension on cars (12 years) as all drivers will have lost 2 years on cars by the time country is back open fully (March 2020 - March 2022).
Agree	All taxis should get an extension when time is up as we all lost a year work
Agree	All taxis should have a 15 year rule the same as wav. They should be kept in good condition and obviously nct certified. There should be no difference between wav and saloon vehicles it makes no sense.
Agree	All taxis should have got 2 years added to age of vehicles,vehicle grant should not be based on millage or age of vehicle,should be equal to qualify,without making it impossible with certain rules that only benefits fleet holders with high miles on cars,2 years lost to covid,no millage on cars.
Agree	All vehicles should be extended
Agree	Although I agree with the above legislation I believe that vehicles that pass an NCT inspection should be allowed continue as licensed Taxis The ten year rule was probably a good idea in more lucrative times but not now
Agree	Although I agree with the draft regulations I think it is very discriminatory towards other taxi drivers (with newer vehicles who have had to extend their loan period)as not only drivers who need to replace vehicles are affected by the Pandemic
Agree	An extension on my car would be good as I have been unable to work as a result of Covid. I did have 20,000 Euro saved for a newer car before lockdown but have spent all of it paying my mortgage etc. Even with the EV Grant I would still have to borrow a lot to buy a new car. Not good now. Thanks
Agree	Any measures to assist industry are to be welcomed
Agree	As a person driving a taxi since 1990 I find it very annoying that because I am a pensioner I have absolutely no rights for help , no pup , no going back to work € 1000 help are we not important enough? We also need help we're now in a very precious position financially as we have had no help whate
Agree	As a result of the impact of the Covid on sPSV industry, I am in full support of the extension of the operational age limit of the small public service vehicles.
Agree	As a taxi driver for over 20 years i already known next year will be my last my car is at end of life in September 2022 like a lot of drivers i wont be able to finance a car next year all i ask is an extension on the age limit for 2 years till we all get back normal thanks aidan
Agree	As Hackneys are not metered and thus unable to charge journey time they should be allowed access to bus lanes

Agree	<p>As I drive a 2015 reg car these new proposals are no good to me and a lot of my fellow taxi drivers. Wouldn't it be more fare to all taxis and spsv operators to extend the 9 year rule to 11.</p> <p>Thanks very much</p> <p>Stephen Hurley</p>
Agree	As I have not worked since March 2020 and have clocked 5000 km approx since then, the car is in the same condition as the last renewal.
Agree	As i would not be in a position to change my car i agree with above
Agree	As one of the affected car owners and not having worked since last year it would be a excellent help to extend the licence on my car and others affected by 1 year
Agree	As one of the affected owners and operators of a taxi, I agree 100% with the proposed Draft Regulation. We need all the help we can get in these uncertain times.
Agree	As the standard of vehicle has Improved greatly by manufacturers. I would be asking WH we cannot keep our vehicles for up to at least 15 years. I don't believe this would affect the quality of the Taxi Fleet. Nct and sgs inspections are suitable to maintain high standards.
Agree	Badly needed
Agree	Because I haven't worked since covid started and I am seeing what is going to happen with this delta variant I think this is a good idea because I cant afford to put a new car on the road in Jan 2022. Thank you very much for extra breathing space.
Agree	Because of my age we didn't qualify for PUP payment and couldn't operate my hackney[no. H39993] as we had to cocoon at home as per government instructions. we lost almost a year of income and would like to apply to have a one year extension to my hackney license. // My Hackney (H39993) exceeds the extra year extension by 3 weeks but government instructions to cocoon, non- qualification for PUP mean no earnings for 1 year. I'd like to apply for the years extension to December 2022
Agree	But to add the advantage given to these drivers not be given to all the fleet so all drivers benefit from these extensions for they have lost usage of their vehicles also other wise discrimination sets into it one rule for all fairness achieved thx
Agree	Can you please look again at time period for expired licences and to allow reactivation at any time in the future. I appreciate the recent amendment but it would be of great benefit to many if this could be considered. Many thanks for all your work to date.
Agree	Cant see why a car passed nct and suitable test is not good enough for a taxi and with not earning nuting for over a year not tru aneyboddys fault one year more on a taxi wood be good for a lot of taxi drivers . And wood be good for the nta that they hear us .

Agree	Car age should be abandoned. NCT and the suitability tests should be all that's required. Why complicate things that don't need to be ?
Agree	Cars should be able to have a longer use as taxi once they are roadworthy and save there should be no limit to years of use if cars are save and clean.
Agree	Congratulations to the NTA for announcing this Draft Regulation early in the year,if passed it will give those licence holders affected,myself included,some peace of mind and be able to plan going forward.
Agree	Couldn't give a flying f k what's you do
Agree	Dear sír. I have not worked since 14/03/2020. Wil I be allowed this lost time in 2024 when my car is due to be renewed. Yours Christy.
Agree	definitely shud be getting the extra year in older taxis.100%
Agree	Delighted with this option as I am not in a position at present to buy a car. Industry is really struggling at the moment, this option will help us get back on our feet. Thank you for your consideration, much appreciated.
Agree	Desperate to have exttention ,to my car February 2012.at least one year .as no money to get a new car or history to get a loan .with no insurance to get industry earning enough to afford paying in extra .to mortgage ,all,household bills ect ...
Agree	Does this mean that my taxi which reaches 10 years In March 2022 will get an extension ?
Agree	Drivers have suffered ,full insurance, fees, licence, business cut by 75%. When do drivers get an increase, why is it once every 3,4 or 5 years, drivers are been discriminated against with all the Buracracy, fines, penalties, Thanks
Agree	Drivers need all the help they can get.
Agree	Due to covid 19 and the impact on personal finance,this is a great outcome
Agree	Due to current situation with pandemic if a spsv vehicle passes both NCT AND SUITABILITY then the permissable age should be extended
Agree	due to the effect of covid 19 I think the industry needs to consider this draft resolution
Agree	Due to the ongoing circumstances I need all the help I can get regarding the age limit to my car and the fees
Agree	Due to the ongoing uncertainty and the unknown implications going forward of the new delta variant which may lead to more restrictions I agree with the above draft
Agree	Due to the uncertainty caused by COVID-19 I am supporting the extension of permissible year for the small public service vehicles
Agree	Essential to extend vehicle age to ensure taxi drivers can return to work
Agree	Everything helps the industry in these tough times.

Agree	Ex the veg age again a year and half with no incom
Agree	Excellent
Agree	Extend every current licence by at least the same period being assigned under legislation. It would be easier to apply a 15 year limit with review in2023
Agree	Extend stay of life of cars as some taxis operators out working since 2020 .
Agree	Extend the ten year rule on a car age to twelve or thirteen years allowing drivers to earn money too reinvest in a newer vehicle for the future
Agree	Extend to 15 years all taxis
Agree	Extending the age requirement would serve as a big relief to time lost using the Vehicle/plate during the ongoing Pandemic.
Agree	Extent age of vehicle rules up to and including 2023 or behond due to financial difficulties that most (including myself) operators are now facing.
Agree	From day one it should have been 15 years, no cost to tax payer, safe because of 6 monthly NCT and Suitability test, no brainer really // As I have always stated it should have been at least 15 years of age from the start
Agree	Fully agree huge relief to operators and their families
Agree	Get rid of the nine year rule and extend it to fifteen years for all Taxis.
Agree	Given the uncertainty of business in the Taxi Industry it makes sense.
Agree	Good day please my vehicle will be 10yrs in june 2022.
Agree	How many yrs do I have to use if due to covid-19 measure. Thanks
Agree	Good news .cheers
Agree	Great help as my vehicle is coming 10 yrs. Thanks
Agree	Great stuff
Agree	Help is needed at this time whilst we try to maintain our Vehicles and keep everything up to date till we try to weather this awful storm Support with insurance is key Thank you
Agree	Hi I m agree with that thanks..

Agree	<p>Hi</p> <p>I welcome these initiatives by NTA.</p> <p>Please provided assistance to all taxis equally so that no one feel left behind.</p> <p>Each & everyone through this difficult times together .</p> <p>Kind Regards</p> <p>Salwinder Singh</p>
Agree	Honestly I'm happy with the Regulation, it has helped me and others to have a relief on the period of covid 19 pandemic, thanks so much NTA.
Agree	I worked as a psv driver for 23 years, my industry has been destroyed by this pandemic, left with with 4 young kids and a mortgage , all the overheads of my small business to pay ,I was offered 250.00 a week pup because I bought a new car and paid less tax that year because car was deducted.more he
Agree	I 100 percent agree that the vehicle age should be extended due to the extraordinary circumstances that the industry is in and that it faces in the future
Agree	I agree
Agree	I agree
Agree	I agree
Agree	I agree
Agree	I agree as trying to draw down loans for taxis is becoming difficult.
Agree	I agree but am worried that we will now have 3 levels of licences. Those whose cars were connected to the licence at and prior to 2011, those whose cars were supposed to expire in 2020 and 2021 and everything else.
Agree	I agree but this measure should apply to all vehicles if it is to be fair and equitable.
Agree	I agree I have a Toyota Prius 2012 in immaculate condition mechanically and appearance I have had very little work since covid which I can verify by the mileage I would be in no position to buy a replacement vehicle in 2022 as I am living on pension only I have been driving taxi for 20 years
Agree	I agree in principle whomever the entire fleet suffered and I have to renew car march 2023 yet I also had little or no work since March 2020 level playing field please
Agree	I agree in principle, however as these vehicles have been sitting still for the last year and a half, why not keep the Suitability test annual and save us all a lot of work and expense
Agree	<p>i agree once you pass a nct for and sgs that in side is clean and in tacked</p> <p>there should be no problem .</p>

	I agree this will be a big help at moment
Agree	Our buisness is all over the place . Not know weather to work or stay at home cas buisness so bad . And to have to change car pluss car lown not vilible at moment. JUST WOULD NOT PAY would just have to walk away after nearly 25 years
Agree	I agree to extend age limit
Agree	I agree to this as all measures to ensure all taxi drivers a fare and positive return to safe employment status is greatly welcomed
Agree	I agree with draft regulation
Agree	I agree with Draft Regulation
Agree	I agree with draft regulation
Agree	I agree with draft regulation
Agree	I agree with draft regulation 100% because of the economic situation and the pandemic crisis.
Agree	I agree with extension on the permissible age of small vehicle as my hackney has been parked up because of covid. I have lost out on insurance also. I cannot afford to purchase a new car in 2022. // My car has been parked up because of Covid19 and have lost out on insurance also. My car is due to expire 2022 and would want it to be extended longer because of Covid. Financially I cannot afford to purchase another car .
Agree	I agree with most of the draft however I fully support that all spsv vehicles been given an extension of two years,,in my opinion I would suggest a consideration that all psv licence fees over the time of the pandemic be waived of 250€ as it's also an expense.
Agree	I agree with the age extension as the work isn't there to support financing a car at the moment.
Agree	I agree with the draft legislation but as I put forward the previous two times I believe to be fair and equal this measure should apply to the whole fleet. Everybody is affected financially.
Agree	I agree with the draft regulation
Agree	I agree with the draft Regulation. Thanks // I agree with the draft regulation
Agree	I agree with the Draft Regulations on small vehicles. My car has been parked up since March 2020 because of Covid . Insurance on the cat but not moving since Covid 19.
Agree	I agree with the draft, cheers
Agree	I agree with the extension of age on spsv..
Agree	I agree with the proposal to extend the Maximum Permissible Age of vehicles as a result of the Covid crisis.
Agree	I agree with the proposed draft regulations because my car is due to reach its max permissible age Sept 2022, if I have to replace it it will cause extreme financial hardship and stress to me on top of the ongoing fallout from the pandemic. Thank you
Agree	I agree with the public consultation draft on small public service vehicles emergency measures.

Agree	I agree with this regulation as my vehical age limit is due in march 22..this will give me the oppertunity to try get the money together through 22.
Agree	I agree with twice yearly inspection. Cars should be allowed to stay in service up to 15yrs old
Agree	<p>I am a full time taxi driver/owner for almost 30 years. The lifetime of my car ends in April 2022. I have no savings due to the pandemic and cannot get a loan or secure fiance to buy and change my vehicle. A one year extension of my vehicle would allow me the opportunity to stay employed in the industry //</p> <p>The lifetime of my car expires in April 2022. I am receiving the PUP payment and have no savings due to the pandemic. I cannot get fiance for a new car and no one will give me a loan to purchase one. I will have to leave the taxi industry after 30 years, unless an extension is granted.</p>
Agree	I am currently looking for my licence to be extended on my car due to financial difficulties arising from the covid pandemic and the lack of work and my hospitalisation
Agree	I am disgusted that all drivers on the fleet haven't been offered two year extension on their cars as we have all lost out on our investment should be equal and fair across the board
Agree	I am getting screwed off AXA insurance . No help off the NTA.With no work available i am paying more that i nrmally pay.how can i get a discount since theres no work available
Agree	I am happy with the draft regulations. According to me the maximum permissible age should be 12 years. Also the driver license and spsv license should also be extended until 2022 or 2023 because only then the taxi work will come back to normal to the some extent.
Agree	I am paying over3000 euros on insurance..which I have only used for approximately three months..glad to see you are on this problem with the Insurance companies.
Agree	I am very grateful to the NTA for this gesture ,thank them for their concern on all taxi drivers, I am very happy for this as I am already thinking of how to replace my car next year, thanks for having us in mind
Agree	I appreciate that NTA is actively looking into the issues, which SPSV industry is facing since the Pandemic has started, and I hope our concern will be heard into the future aswell, and will be provided with the solutions thanks.
Agree	I believe it is only fair to now extend the age limit on SPSVs due to 'expire' in 2022. Despite the current predictions that the Economy should improve somewhat in the near future, operators of the vehicles mentioned have faced severe hardship during the past 16 months.
Agree	I believe that the vehicle life should be extended to a maximum of 15 years and should apply across the all of the categories. Including all the current licenced vehicles

	I believe the age limit should be raised to 12 years as vehicle get a more stringent testing in both NCT and suitability requirements.
Agree	Thanks.
	I bought a March 2012 Hyundai i800 Feb 2019 for €15,000 expecting to get 3 years out of it €5000 a year. I have COPD so there was not any way I could work . Yesterday was my first day to work since 18March 2020. I have a spotless van with 54000 miles ends March 2022 which I cant afford to replace
Agree	
Agree	I cannot afford a new car at this time
Agree	I do agree but think every taxi should get at least a year extension on the year of their cars as we haven't earned a wage for the last 15 months so would find it hard to change their cars
Agree	I drive a 132D Skoda superb, why do I and other drivers of cars of a similar age not get the same deal , after all, we all lost our income, due to covid.
Agree	I drive toyota prius 2012.Due to Covid, lost of earnings putting lots of taxi drivers financial handi. So I'm pleading on behalves of taxis 'Extension for 2012 atleast once.
	I feel that the carriage office needs to more accessible and less ignorance from staff.
Agree	I dread going out there because of staff's attitude.
	I feel there should be a stay of execution for all vehicles for a couple of years at least because financially the pandemic has destroyed drivers and it would give us all a small bit of breathing space so can try survive in the taxi industry
Agree	
	I for one appreciate all the help the NTA have given us!
Agree	Thank you
Agree	I fully support the attached
Agree	I have a perfectly roadworthy 2007 Mercedes E Class spotless inside. Customers cant understand why I have to change.
	I have a taxi due to be changed in 2022. However due to the pandemic I have only used the taxi for very short periods during the past year and a half. A extension for use of the car would make an incredible difference to my financial situation
Agree	
Agree	I have just purchased A new electric car, just wondering was there any sort of grants to help with new electric meters,/security cameras ect
	I have Traveled Spain France Portugal and all the taxis I got were all 15 years old and more this 9 year rule should be Scrapped SAP people have not got the money no more .
Agree	Kind Regards Tom Daly.

Agree	I haven't been able to use my car for taxing till date since February 2019 due to the fear of Covid 19 pandemic. It is a very great loss to me because I couldn't make any income on it and yet I have to change my car next year under the 9 year rules age limit. I couldn't make any income to buy new
Agree	I HONESTLY THINK THAT REMOVING DRIVERS FROM THE TAXI INDUSTRY IS A DISGRACE AND A NO BRAIN-R BECAUSE OF THE YEAR/AGE OF THE TAXI'S,IT'SVERY HYPOCRITICAL THAT THE N.C.T GIV EACH TAXI A CERT OF ROAD-WORTHINESS AND THEN THE S.G.S PUT AN AGE LIMIT ON TAXI'S🙄,THE WAY THE WORLD SITUATION IS AT THE MOME
Agree	I hope it will be better for us
Agree	I know you are doing your best but this does not go far enough age limit for cars should go back to 14years to give us a chance to get back on our feet there is still no work out there not much anyway. ALL DAY AND NIGHT DRIVERS WORKING SAME HOURS.
Agree	I need all the help I can get to keep my taxi onthe road as I will not be looked favourable by the banks for finance for a new car until things get back to some way normality.
Agree	I need extension on my car. // I need an extension on my car .expires on jan 22 help Please // Yes my car is due to be of the road jan 22..need an extension help please
Agree	I Read the consultation document I think they are as good as could be expected but the nta really need to stop this These changes need to be put in plain English not legal speak so that drivers who speak english as a second language can understand them / I would just make one point if I may I Read the consultation document the nta really need to stop this These changes need to be put in plain English not legal speak so that drivers can understand them . The nta needs to remember that we have a large minority for who English is a second language
Agree	I really am not in any financial position to buy a car now or the foreseeable future, so this .amendment would be a god send, thanks very much Paul Jack.
Agree	I really appreciate nta decisions in the favour of taxi drivers. Thanks a lot. I agree with draft regulation. Thanks
Agree	I really need the age limit to be extended as I am struggling for work and am really stressed out at this time
Agree	I thank the NTA for this relive support, because this will give we drivers a breathing space to prepare to buy another car for the business.
Agree	I think taxis age limit it should be at least 15 years. Because Financially everything so hard now. Specially trying to get a car loan .
Agree	I think all spsv vehicles should have no end of life date as the nct are the body charged with ensuring that they are roadworthy

Agree	I think it will be a welcome amendment to the regulations for many drivers who cannot avail of credit due to the pandemic.
Agree	I think it is an excellent proposal and very much appreciated
Agree	I think it is only fair to extend the vehicle license another year due to the effects the pandemic has had on the industry
Agree	I think it should be a 15 year rule we have already lost 2 years
Agree	I think it's only fair to do this
Agree	I think it's a great idea to extend the life of a car as people are still under financial pressure as the work is not back yet.
Agree	I think that you are doing a lot for the taxi industry so well done thanks
Agree	I think the car life should be extended to at least 15 years old
Agree	I think the draft regulation is right as my car is in very good condition thanks
Agree	I think the maximum age of a taxi should be 15 yrs.. given the standard of cars now a days ..if a car has to be tested twice a year for nct and suitability there should be a reduction in the fee..
Agree	I think this could give make things easier for all concerns in these very hard times.
Agree	I think this is a good idea as there is so much economic uncertainty ahead and we don't know what covid will throw at us next.
Agree	I think we should bring back the 15 year rule before having to change their car for all saloon cars
Agree	I think whatever time you have been parked up during COVID-19 the same time should be reimbursed how are people supposed to be able to pay for a new car if they can't make repayment this is very simple ,if I get a new car and there is a lockdown what is going to happen car gets repossessed thank u
Agree	I told you to do this 15 months ago. You're just messing now, the stress you caused me all through 2021 worrying. Always conservative never encompassing. Embarrassing really
Agree	I totally agree with whatever measures you take , everyone needs a bit of help sometimes and we could all do with a little in these strange times
Agree	I tried to change my car to electric this June ,but the bank let me down ,it was a great deal with the grant and a interest free loan I will try again next year
Agree	I very much welcome this proposal from the NTA for an industry which has been severely impacted due to covid-19 and the continuing uncertainty caused by the delta variant.i personally would benefit from this draft as my vehicle would reach its maximum age in 2022,but i would support it anyway.
Agree	I was hoping for an extension of at least 2yrs or to 2025 to allow the economy to recover and to try putting money away for a change of vehicle.

Agree	I was saving hard to buy a newer car .But with covid with payment of 250 per week. I no longer have savings. I still had to pay my full insurance even though no working..I keep my car well clean and full maintenance it's like new thanks Chris Daly
Agree	<p>I wish to make a submission for Emergency Measure COVID-19) (Maximum Permissible Age) Regulations 2021.</p> <p>John Flynn</p> <p>Phone: (086)8407000</p> <p>SPSV Licence Number: 27935</p> <p>Vehicle Reg: 12CE2502</p> <p>Category: Hackney</p>
Agree	I won't get a car loan due to the pandemic so i agree to this proposal. With thanks
Agree	I would also like the nta look at the NCT failing vicales over the protective screens. They are failing over no eu standard for which there is not one . Even if you get a screen from a registered supplier. Hope you can advise nc t. That the screens are necessity at the moment. Thank you .
Agree	I would find this helpful as my taxi is due for renewal in 2022 and I have not worked since the pandemic started
Agree	I would like to apply for an extension on my taxi. My taxi would be 10 years old in February 2022.
Agree	I would like the age of my taxi to be extended thanks
Agree	I would like to see an extension of vehicle age limits,particularly those which are due to expire in January 2022.As my vehicle falls into this category I feel under severe pressure to obtain finance for the renewal of my vehicle .And as my vehicle is as good as if not better than some younger ones.
Agree	I would like to see draft regulation continue until we're back to as as normal as is possible ,pre covid.
Agree	I would like to see the cost of 6 month NCT being waived and the 6 month suitability test is an unnecessary inconvenience.
Agree	I would like to see the maximum age limit increased for another year. I'm currently operating 12RN788, licence no 27032. Been able to operate this vehicle for another year would take alot of financial pressure off me. Thank you. Noel Gurn.
Agree	I would personally not be able replace my taxi in February 2022 after a hard year and a half of covid and lack of income I would be forced to hand back my SPSV license if I had to replace my car this year . An extension on this would be the best option for myself and my family.
Agree	I would suggest that this extension be applied to all existing vehicles.

Agree	I'd love to stay in the taxi but I need an extension of 3 to 4 years To keep going 🖐️ I can't justify paying 50,000 in Texie to keep going at this time
Agree	If I have to change my vehicle 13th January 2022 it would mean trying to get finance based on 2019 tax return, this would be difficult as I was receiving covid payments throughout.
Agree	If the pandemic continues as can be seen, the entire industry will require that all taxi purchased should be vat exempt and a lower rate of duty
Agree	I'm out sick at the moment I think you should be aware nobody is working also I believe there alot off taxi people out there like I and I think you should be advising us and making us aware much better what green cars to get whats the best value and how much in grants are available and how to ge
Agree	In my opinion,we should get another few years extended on the 9 years rule,as one we had no work for nearly 2 years due to Covid-19,and no.2 it would be impossible to even get a bank loan for a new car in this current climate
Agree	In the light of this pandemic i really think this kind of action by the nta is more than welcome. It will take time to get over this.
Agree	Increase all car life to 15 years Most will be changed prior to 15yrs Mainly between 10 to 12 years Will take pressure off taxi drivers in uncertain times
Agree	Increase for as long as possible as things are not going back to normal any time soon
Agree	It is a good thing drivers are finding it very hard since covid i still think more should be done
Agree	It is just right and logical
Agree	It is only fair that this is sanctioned as the industry has been decimated over the last 16 months due to Covid
Agree	It is very difficult to make a living due to the covid crisis and I couldn't afford to upgrade my car in the foreseeable future, so this will give me some time to upgrade.
Agree	It means so much to me that my taxi maximum age will be extended. At present my car cannot operate after 21.01.22 .This extension of 12 months gives me breathing space.
Agree	It should be 15 year rule not 9 or 10 , but 15 year's I mean the cars now are really looked after and some of the ones already taken out of service were better than some of the cars left on the road
Agree	It will be a great help to all in the industry
Agree	It will help the industry greatly
Agree	It would also be very helpful if the nta gave financial help with insurance
Agree	It would be a great help for the taxi drivers!
Agree	It would be a great help to drivers to be given this extra time .

Agree	It would be a huge help to me to have an extra year of work with my car as I will have a bit more time to save towards changing my car, my Toyota Avensis is in pristine condition. Thank you so much.
Agree	It would be financially impossible for me to change my vehicle in Jan 2022 due to my serious loss of earnings over the last 18 months
Agree	It would be of huge benefit to have an extra year in these uncertain times. Thank you Jason Staunton
Agree	It would be very beneficial to me if i was to get another year on my hybrid taxi i drive a 2011 Toyota Prius which is spotless condition and well maintained ..also very low mileage ...
Agree	It's good to see the ITA trying to support the industry ..
Agree	It's only fair that cars that were coming to end of life in 2022 get the same treatment as was given to older cars in 2020 and 2021
Agree	It's the fairest way to do it and takes a major weight off my shoulders regarding the maximum age.
Agree	It's the right thing to do, industry is on its knees!!
Agree	It's a welcome development and a commendable effort on the part of the government and the National Transport Authority to propose to Amend the legislation with a view to alleviating the untold impact of the covid 19 on the livelihood of SPSV drivers. Kudos and more grease to your elbow.
Agree	Its been a bad 2 years this is a great help. Thank you very much
Agree	It's obvious. Just do it. More red tape for no reason
Agree	Just do it and stop wasting time and money on these useless debates! It's a bloody disgrace that u didn't do this last year and just extend the age limit to 13yr! Everyone benefits!! I guess u are all trying to justify your huge salaries!!!
Agree	Keep up the good work. Cherrs // Keep up the good work. Cherrs // Thank for all your help, keep up the good work. Cherrs
Agree	Keep the age of vehicle as long as it passes NCT
Agree	Looking at some wheel chair taxis on the road and the age limit I cannot understand why there is a 10 Year limit on normal taxi all taxis should have a 15 year life span
Agree	Makes Sense 👍
Agree	Maximum permissible age should be extended for ALL taxis that were registered as at March 2020
Agree	Maybe consider also extending all other spsv vehicle licences for an extra year or two. I bought a 2016 car in January 2020, put it through all tests and nct and converted it to a taxi by march 2020. I have never been able to use it as a taxi yet. I haven't worked since March 2020

Agree	<p>Most taxis have not worked since March 2020 and struggling to provide for there families.</p> <p>All taxis should have the same terms and conditions as WAV and be giving a life span of 15 years, a WAV is not different from the other taxis, they work the taxi ranks and there meters are calibrated with same</p>
Agree	<p>My car will be 10 yrs old on the 9/1/22. I have only operated the taxi a small number of times this year as fear of getting covid stops me. Now I am vacinated I may well return to work but financially would not be in a position to change my car in January. I really need this extension.</p>
Agree	<p>My car will be age over in early 2023 and way things are going I will be off the road .I think even make all for 12 years</p>
Agree	<p>my license renewal is end of August so gives me a chance as my finances are not great.</p>
Agree	<p>My own vehicle is due to reach age restriction in 2022. It will extremely difficult to raise finance to fund replacement vehicle due to environment covid has imposed.</p>
Agree	<p>My spv is 15 years old in May 2022. Will I be able to renew for 1 more year?</p> <p>Plate 18481.</p>
Agree	<p>My taxi 06 lexus ,runs out in November 2021.</p> <p>Is it extended to 2022?</p> <p>It is a luxury car,and is converted to LPG,which is 90%,less emissions than,Diesel,and less than petrol.</p> <p>I spent almost€2000,on the conversion.</p>
Agree	<p>My vehicle failed it's nct today because the covid/security screen had no certification stamp. It is of the highest standard, formed specifically for my vehicle and it was impossible to purchase one ready made.</p>
Agree	<p>My vehicle is a 2012 Toyota avensis. It will be 10 years old in February of next year. I don't have the money to replace the vehicle at the moment. I don't want to get into debt with a loan because of the environment we are in now because of covid 19. Yours faithfully Liam Nolan</p>
Agree	<p>My vehicle is due to reach it's maximum age limit on 12 Jan '22 (T12327).</p> <p>It would be a great relief to be able to continue using my vehicle next year.</p> <p>I'll keep my fingers crossed and thank you for this message.</p>
Agree	<p>My vehicle is too reach its age limit in February 2022, and I haven't a hope in securing finance for a new vehicle as I've been effectively out of work since March 2020. This draft regulation would give drivers a chance to get back up and running, hopefully.</p>

Agree	Need extension on car up in January 2022 can't afford one as I have not worked for years and a half
Agree	No comment, just want the extension brought in in good time.
Agree	None
Agree	On a HP AIB car loan. Requested from them an extension of payment. There was 2 years left on a 5yr loan. Can the banks be encouraged to be more flexible on these small business loans where customer had a flawless payment record. They are taking advantage.
Agree	Only right that the cars of 2022 should have their vehicles age limit extended another year considering 2021 has been severely disrupted by the pandemic.
Agree	People who bought a car before the pandemic started struggled to make payments and therefore should be allowed the same amount of extra years on their vehicle otherwise they are being discriminated against
Agree	<p>Plate No 23783 - Brendan Murray</p> <p>Another very welcome initiative from the NTA. We still face major issues in getting finance for replacement / upgraded vehicles. Takes the pressure off until business levels get back to normal levels. Thank You 👍</p>
Agree	Please I want ask maybe 2011 car was extended to additional year or not
Agree	<p>Please i will appreciate if the age of our car can be extended which will help a lot in getting a replacement car.</p> <p>Thanks</p>
Agree	Please allow to transfer taxi licences to others thanks
Agree	Please extend age of car regulations till 2022
Agree	Please extend the life of all the current taxi fleet not just a chosen few. Many drivers have lost the ability to save towards their new car these savings will never be recovered and finance is very difficult. Sandra Donnelly taxi drivers wife.
Agree	Please give age extension to all taxis as mine expires in 2022 I've received an extension but my vehicle is parked up in the yard gathering dust I've not worked since March 20/20.
Agree	Please give drivers that can't buy new cars at the end of this year an extension of at least three years to get back on their feet because of 18 months of Covid19 and everything closed
Agree	Please include Free now, Uber and Bolt as taxi despatch by NTA regulations, as they don't pay drivers credit card payments and cancellations fees which they collect from the customers.
Agree	<p>Plenty of common sense,</p> <p>Thank you all your help much appreciated.</p> <p>Regards Pat</p>

Agree	Pup was very unfair to older drivers who could not work due to covid and had to survive on OAP of 240eur while others got 350euro
Agree	Really important that we are allowed extra year extension to be able staying the taxi industry
Agree	Should be an extension for all taxis for an extra year regardless of when vehicle due to expire.
	Should be extended 36 months
Agree	Thanks
Agree	Should be extended to 15 years for all vehicles...
Agree	Since the pandemic started in March 2021 drivers have been unable to make payments on loans for vehicles and for that reason it will take longer to clear loans beyond 2022. What measures will be available for drivers in this position
Agree	So if I'm correct when my 2012 taxi is 10 years old next spring 2022 I will avoid having to purchase a new car ? Yes that's a relief . How long will the extension be for?. Thanks
Agree	Stop. Drivers. I small townessum ar. Farmers sum on pension 8. Euro run5. Euro
Agree	Taking into consideration of the ongoing situation with covid. I do hope 2022 will be wavierd for cars regards 10 year rule.
Agree	Taxi business going take yrs to recover, extend the vehicle licence to 15yrs to give us a chance to try and survive, if you grant us the 15yr age limit, you can impose a condition that the next taxi vehicle must be a ev of some description, or if you change your exiting vehicle you must get ev.
Agree	Taxi driver need a chance to get back on their feet. Catch up on their mortgage payment to keep the roof over their heads before thinking of new cars when the ones we have now have been layed up doing no mileage for the last year and 3 months
Agree	Taxi drivers need every help they can get they haven't worked for the last year and a half need that time back in there car
Agree	taxi drivers need help now so we can continue to provide an excellent and professional service to the people of Ireland
Agree	Taxi drivers of older cars must be given the opertunity to work and earn in a normal functioning market before they are forced to scrap a perfectly good vehicle.
Agree	Taxi drivers will need all the help they can get over the next two years as our earnings have been decimated
Agree	Taxi industry have suffered on this pandemic. We need consideration from the Government seriously
Agree	Taxi industry in Ireland should be given priority
Agree	Because transport system here is saddled with gross inefficiency compared to western Europe

Agree	Taxi-drivers need all the help they can legally get. So I agree with the Draft Regulation.
Agree	Taximena women cannot afford new cars to go back into the buisness without this concession
Agree	ten year rule is not fair to saloon drivers and should be abolished
Agree	Ten year rule is unfair
Agree	Thank you for pushing out the age limit on the taxis as a car loan would be impossible for most on this present income
Agree	Thank you for your proposals to assist taxi drivers remain in the industry. Most cars have been off the road for the best part of 2years. Subsequently, the low mileage, wear & tear, etc on vehicles will be substantially less. May i propose that an extension of one/two years for all cars apply.tx
Agree	Thank you for your understanding PJ
Agree	Thank you to the NTA for stepping up to the plate re assistance for the taxi industry.
Agree	Thank you, extreme financial pressure lifted from my self and few more thousand families. Please push this through 🙏
Agree	Thanks
Agree	Thanks for looking after the Taxi drivers. With such taught.
Agree	Thanks for maximizing the age of taxi cars.
Agree	Thanks for the early announcement.Makes things much easier for us.
Agree	Thanks for the support to industry. I have not received any notification regarding insurance premium reduction. Ihave not worked my Taxi since 1/01/ 2021.
Agree	Thanks this would be a great help to me and the industry.
Agree	Thanks very much I was at my wits end, my car expires 12 01 2021 . I have been unemployed during the pandemic I don't have the deposit for a new car. This gives me the confidence to go back to work full time. Please god I'll have a deposit for a car in 2023. Thank you 🙏
Agree	Thanks.
Agree	That would be good // Thanks for the extension
Agree	That's a new email address tks
Agree	That's the least support can be given by government to the space operators. In this time there is no hope that we will be able to purchase new vehicles.
Agree	the 10 year rule has to be extended for 2012 cars.it will give us time to save after re opening and flights starting back up.thanks // well done as regards the age extension.badly needed.
Agree	The age limit should be done away with it.

	The age of car should be raised permanently
Agree	There should be a clause for an extension of car age for someone unable to work due to serious illness.
Agree	The age profile of the car is very important as I have not had work in 18 and cannot afford to change the car. // The age profile of the vehicle is very important as I have not had any work for the past 18 months. Cannot afford to change car so I will need extra year.
Agree	The covid19 has brought a devastated effect on our businesses. Example I have 2011 years old car, no money to buy another one. Please consider our plights by extending the years of the car until things get back to normal.
Agree	The extension of permissible age is welcomed as my car is up on the 3rd of January 2022 so was 4 days outside of the original extension. The mileage on the car, after not having been driven as a taxi for the last 18mths is a lot lower than my previous cars' mileage so to scrap now would be a waste.
Agree	The extension of the vehicle life to 2022 would be at great relief.it would take the pressure of a lot off driver's
Agree	The legislation should be changed for all vehicles, not just rolling it every year. We now have a 2005 car on the road for another year but a 2013 car is off the road next year.
Agree	'The maximum permissible age' is highly important to taxi drivers, pls consider further extending the permissible age. Thank you.
Agree	The NTA, since the inception of the pandemic, has been working very hard to look after the operators under its authority and it's highly commendable and appreciated. I support the Draft Regulation 100%.
Agree	The Taxi industry is not a sustainable industry anymore and costs outweigh the income to be made even before Covid-19 it was getting bad.Im leaving the industry and with pleasure. The regulations is one thing I won't miss .Cheerio NTA
Agree	The work isn't coming in for drivers to able to get a loan for a car and they are crippled with high insurance the industry should only be open to taxi drivers only not people double jobber
Agree	There is no need for any age limit. If a vehicle passes NCT and Taxi renewal it should be allowed to operate the same as any other public service vehicle irrespective of age
Agree	There should be a 15 year rule on all public service vehicles ,Thank you.
Agree	There should be at least a 2 year extension for all cars that's are due to be scrapped
Agree	Thing if it passes nct + sgs.its roadworthy.
Agree	Think it shows fairness. Most cars have been off the road for a year or so. By allowing the extension it gives back the lost year.

Agree	<p>This extension is required and needed by many taxi drivers. Introducing this regulation will be welcome by these drivers.</p> <p>William. // This extension is needed now. more than ever.</p> <p>Industry needs a lot more time to recover.</p>
Agree	<p>This is a much needed and vital support for the industry. Accessing finance will be a struggle for nearly all taxi drivers.</p> <p>Regards Conor</p>
Agree	This is a must for drivers going through incredibly difficult times.
Agree	<p>This is a very senceable and welcome response to the industry's difficulties at this time, however I would suggest that modern vehicles have a longer serviceable life and could easily remain in the fleet until 15 years old.</p>
Agree	This is an excellent idea and will be greatly welcomed by the majority of taxi drivers.
Agree	This is another good step in right direction.
Agree	<p>This is considerate of the NTA.</p> <p>With all the uncertainty posed by this pandemic, this measure is highly welcome. It will reduce anxiety and stress. Well done</p>
Agree	This is great news and it will help every driver and operator out.
Agree	This makes good sense under current circumstances.
Agree	This measure will save me and so many others so much stress going forward into next year.
Agree	This move is most helpful to hard pressed Taxi drivers, thank you NTA
Agree	This new draft is essential inorder to continue as spsv owner/driver,
Agree	This should be extended to all vehicles I have not worked in nearly 2 years
Agree	This will be a great help to our industry and is much appreciated thank you
Agree	This will be extremely helpful to the taxi drivers involved and ease some of the pressures felt by all.
Agree	This will enable me to get out of debt I incurred during pandemic and get s fresh start in 2022
Agree	This will relieve the financial pressure for the next twelve months and allow me to purchase a more up to date electric vehicle to replace my current car.
Agree	This would be a great help for taxi drivers
Agree	This would be a great help to taxi drivers at this time.
Agree	<p>This would be absolutely fantastic as my car is included in this and would give me extra time to save up for a new vehicle.</p> <p>Thank you</p>

Agree	This would be great for me help me out
Agree	This would definitely be a help and is really welcomed
Agree	This would help a lot it's a shame it's not for 60 months I can't see our industry getting back to where we were for many years.
Agree	This wud be a great help to the many drivers being forced into upgrading there vehicle when the work isn't out there and help keep people in the taxi industry instead of forcing them out of it .
Agree	To add -all cars need to be given 15 years ,at the very minimun ,just like wheelchairs .
	To give us a chance to survive it is vital to extend the max.age of vehicle to 15years.. Thanks for your time..
Agree	T16241..
Agree	To really help taxi industry all cars need 15yrs age limit. Wheelchair taxi, limousine ,vans doing school runs no limits, why not cars??
	To whom it may concern
	My lience came up for renewal during lockdown I had to pay € 250 am I entitled to a rebate
Agree	Regards David Reddin
Agree	TOO MANY REGULATIONS
Agree	Vehicle licence for SPSV should be extended to 13 year life on a vehicle,this would greatly assist drivers in terms of finance arrangements.
Agree	Very good idea because it will help the taxi drivers to be able to work and feed their families thanks and God bless
Agree	Very good idea for driver
Agree	Very happy to be able to get an extra year on my current vehicle as would find it very difficult to raise finance after suffering such financial losses over the past year and a half.
Agree	Very much welcome for all concerned
Agree	Very pleased about this as would have had to change car 2022 and have not worked in last 18 months. Am OAP no income in last 18 months changing car would have been too expensive. Thank you
Agree	Very welcome to a lot of drivers.
Agree	We Need help this goes some way to helping us but its a hard job now, Tough Times.
Agree	We should be able to sell our plates, for wat we paid for them, €7500. If we want to retire,
Agree	We still need the 15 yr rule it will cost nothing // I agree with some aspects but we need a 15 yr car expiry date thanks // We need a 15 yr deal with the cars

	Welcome news for decimated taxi drivers.
Agree	I was still quoted €1600 for renewal in July 2021.I have not driven a taxi since 13th March 2020.I am working in construction and would gladly give my licence back for the price I paid in July 2006.€12,500 was a lot of money then and is now a fortune in time
Agree	Well needed in such a devastated industry
Agree	We're are still struggling to get back to business after covid.
Agree	What about help insurance on taxis for working taxis and nct fees
Agree	What's the story with Nct and road tax which was announced 6weeks ago and and hasn't happened yet. All this too little too late. We seem to be a forgotten industry.
Agree	Whilst this is a huge benefit for those directly effected all taxis should be allowed an extension of age due to the lack of income and allow spread car repayment longer. Age limits extended to 15 years for all till 2030 when EV will be standard
Agree	Why wasn't a 15 year FOR ALL TAXIS brought into play when this pandemic?? Disgracful treatment really what about 2013 and 2014 saloon car licences ???? Seems to be that this had to begged for this extension
Agree	Will all affected licences expire on 31/12/2022? This will put great pressure on the NCT and SGS services. Kind regards Tony Desmond.
Agree	Will be of good value to all drivers.
Agree	With so little work for taxis now the 6 monthly NCT test should be free. The running costs are so high including insurance that its difficult to make a living out of them. Thanking you for the opportunity to submit this.
Agree	Would like vehicle age to be increased until 2022
Agree	Yes all taxi's should have the same life years on the road, Saloons 10years, WAV 15 years, limo's no age limit. How does that make sense, Taxi industry on its knees. Not the time for upgrading cars. Impossible to get finance. All cars should be 15 years rule,
Agree	Yes everything possible should be done to help us taxi drivers try get back on her feet again things are quite bad we need all the help we can get
Agree	Yes I agree

Agree	Yes I agree especially getting a year extension in 2022. If the car passes NCT & SUITABILITY tests there should be no problem extending.
Agree	Yes I agree there is no work out there at the moment and I have to change my car next year which is wrong so hopefully I get extension
Agree	Yes I agree with draft regulation. I will suggest an extension till end December 2023. To enable complete recovery from Covid 19. Thanks
Agree	Yes I support the one year permissible age due to the present situation now
Agree	Yes i think the age off all cars should be extended.. i hardly drove mine in the last two years.. its to much pressure on drivers...
Agree	Yes it will give me and other drivers a chance to get back on our feet
Agree	Yes my licence is to expire in Feb 2022 and with covid I won't have the money to buy a car so an extension is needed
Agree	Yes to all above // Lost to much time and work vehicle not worked enough // To much loss in covid my vehicle is to good to get rid of in 22 thanks cyril
Agree	Yes we need this to keep going at the moment there is little too no work out there especially in rural areas
Agree	Yes, I agree with the draft regulation.
Disagree	1 year extra at least should have been given to all vehicles still paying for my car when the payments are finished I have to get a new car 2 years gone with my car already my car is like a new car should have been given an extra year with it
Disagree	a big problem with most drivers is they want cars to be extended to 12 or 15 years makes no sense at all if the car is roadworthy when there is bangers of dublin buses driving around 05 06 give Us a break and do the right thing
Disagree	All drivers have lost 15months of the road it would be much easier to change from 9yrs to 10yrs rule for the entire fleet that would be fair.
Disagree	All present vehicles should be extended by at least 1 year , maybe 2 as they are working way below capacity.example in2028 when a vehicle reaches 15yrs. That's should be extended 1 or 2 years.10yrs should go to 11 yrs for yearly suitability test & MOT
Disagree	All taxis should have ten year rule rather than nine years rule..... I.e. 10th year of car should be the year when last suitability inspection is done....
Disagree	all taxis were affected by pandemic. max age should be increased to 12 years until 2030, even with Nct every 6 months after vehicles reach 10 years

Disagree	<p>As I have not used my car as a taxi since march2020 and have only covered 6000km privately I feel my car should have a licence extension age wise for a period of 18 months when it reaches 10 years of age in august 2023 obviously subject to passing theNCT and suitability test . Vehicular ageism is w</p>
Disagree	<p>Continuation of my previous email</p> <p>Mechanical and visual inspections.</p> <p>Re enact these regulations as they were pre 2013 // I refer to my previous letters to NTA Shane Ross Leo Varadker Eamon Ryan and a conversation I had with Michael Martin Taoiseach outside his office on Merrion St 2 months ago.</p> <p>My request was and still is: Extend the age limits on taxis up and until 15 years for the next 5 years. After 10 years 2</p>
Disagree	<p>Does nothing for me out of work for over a year paid insurance for full year and got nothing</p>
Disagree	<p>Every spsv driver lost two years on the their vehicles due to this pandemic, So everyone should get two years added to their vehicle's life not just people whose vehicle's final date of operation is 2021 or 2022.</p>
Disagree	<p>Every taxi should get one extra year on their licence. I have not worked since Covid began in March 2020 but as my car is only five years old,I could lose up to two years of the working life of my car.This is extremely unfair.</p>
Disagree	<p>Every taxi should have a max working life of 15 years and not 10.</p> <p>Also note there are hundreds of taxis granted wheelchair licences all over the country that have never being used or available for wheelchair passengers. Its a loophole used to over supply taxis and needs to be stopped</p>
Disagree	<p>Hi,</p> <p>I feel the age extension of vehicles should be fundamentally available to all vehicles. Every person working in the taxi industry has been affected by COVID.</p> <p>Therefore, from my prospective this extension should apply across the board to support all drivers. We all need to be treated equally</p>
Disagree	<p>I appreciate that vehicles need to be of a certain standard to operate as a taxi, ie, cleanliness, etc but if a vehicle can pass an nct while well maintained both inside and out there should be no age restriction.</p>

Disagree	I believe that the current age limit on taxi Hackney vehicles should be extended from 10 years to 15 years and should be reviewed in 3 years time This would give taxi operators an opportunity to allow their businesses to recover A review in 3 years would allow for a more informed decision
Disagree	I bought a 5 year old car intending to work it and pay for it over 5 years .I have lost 18 months of that time so far through no fault of my own.I feel it's unfair that I will be required to change this car having only worked it for 3 years or so instead of the 5 years I budgeted for.
Disagree	I disagree
Disagree	I do not have a problem with extending the max. age of any SPSV but feel that the extension should apply to all SPSV's not only those due to expire in 2022. I believe it is unfair to extend some vehicles by 2 years while others are not extended at all. All SPSV's should have their max. age extended.
Disagree	I don't have f...king taxis yet you people keep putting these regulations on us that are ment for taxis you people never listen joke
Disagree	I don't understand this year by year approach. Just increase the age by 2 years across the board. Why do you think a driver with a 131 or above car is in any better financial state than the ones with up to 2012 cars ?? Increase across the board and give ALL drivers a fair chance to recover !
Disagree	I feel its only fair that all vehicles are are given two years extra on the expiry of there licence. Even though my own expires next year and looks like it will be allowed an extra year.
Disagree	I have a 162 car and I've lost almost 2 years work so why someone with a older car can benefit where I loose out this is a joke,why can't u extend every car to 12 years makes sense to me
Disagree	I think all vehicles should have a extended period as all taxis have basically lost 18 months work regardless of there age
Disagree	I think that this draft is of no use to a lot of taxi drivers in the industry, as the biggest problem now is the age of the car rule. My car will have to be changed next year and any savings I had for a new one are gone, due to no work over covid and a bank or credit union will not give me a loan.
Disagree	I'll say it again. If a car can pass the nct and suitability test it is safe and clean and suitable for use as a psv. Age is just a number. No such restrictions for buses and limos. Most of which do the same if not more milage. A convincing answer still not forthcoming.
Disagree	In my opinion, I believe some vehicles should be exempted from the age limit based on their brands, comfortability and luxury.
Disagree	In regards to a licensed vehicle, I believe there should an industry wide extension of 24 months to the lifetime use of those vehicles. 10 years use is not being met if during the Covid Pandemic the vehicle was not being driven.

Disagree	Insurance should be paid for by the state 100% as promised by Eamon Ryan earlier this year. I'm a chauffeur/guide with a limo, haven't worked since October 2019, no money earned, still paid full insurance for 2020 and 2021. Can't afford to pay for another year to keep my vehicle on the road for 2022
Disagree	I've had the same financial impact as any other taxi driver, whatever time extension is applied should in my opinion apply to all taxi's. This would be fair to all.
Disagree	My vehicle will expire on the 5th March 2023. I'm worried if I can finance another vehicle by then. With the current situation of things I can't see myself being able to make it. Thanks.
Disagree	Need to talk to taxi driver on this as every driver is different
Disagree	Never agreed with 9 year rule.If your car passes its Nct and Sgs annually that should be enough, it's either roadworthy or not. Our industry is on its knees at the moment trying to get a loan at this time will be impossible banks credit unions won't want to know. You'll be asked for proof income
Disagree	Playing field, investment and costs should be the same for all parties. This change would alter the fairness imo
Disagree	Please increase the age limit of all taxis for at least 2 years. We all suffer in pandemic. FOR Increasing 2 years age limit NTA do not need to spend a single cent so why NTA have problem for that
Disagree	Please, could the NTA seriously consider extending the age rules to all Taxis. Most of the fleet have been parked up for the last 16 months . This means no wear and tear on the vehicle.This is very important to those of us who invested in New Cars with the hope that we would get at least 10 years .
Disagree	Shouldn't have to do 2 ncts a year,crazy
Disagree	Taxi drivers need to be able to rent there plate out or a buy back system to be put in place.. // All taxi should have a 2 year licence extended due to covid and the fact the footfall is just not their to earn a living .
Disagree	Taxis should be given the 15 year rule,no need to change a car if it's clean and running fine,there should be more buses and coaches coming of the road with the state there in than taxis,
Disagree	The age limit for all taxis must revert back to 14 yrs the affect of covid 19 will be felt well into 2023 24 before the taxi business returns to normal trading I my self wil not be in a position to change my car in 2024 as am waybehind on my car loan large psv buses are not subject to ten year

Disagree	The age limit of taxi should be push out till 2024 as it is impossible to get a loan from the banks, and the price of taxi insurance is crazy I have just paid 2150 euros for my insurance, that is crazy. They are the only things in the draft I would like to see changed. I don't think the dept of know
Disagree	The age of vehicles should be extended by two years as most have been off the road for a year and a half the very minimum being one year to allow drivers to recover some kind of earnings the can be shown as income to a potential lender when they have to charge their car // please extend the maximum age to Dec 2022 as this will allow me to show a potential lender my ability to repay a loan
Disagree	The age rule should be scrapped A bus over 9 years can carry multiple people, But a taxi can't The rule is a joke like those who came up with it
Disagree	The pandemic affects ALL SPSV Drivers but only a few are benefiting as the "enactments" are haphazardly. Proper thing is to increase ALL SPSV Expiry Age by one or two years across board, so every SPSV Driver benefits, as all are affected. Thanks.
Disagree	The practical solution to age limitations is to incentify drivers to buy into electric n hybrid vehicles,by allowing 13 yrs lifespan on these eco friendly cars as opposed to 9 for petrol or diesel.This gives drivers additional time to re-coup more of the initial cost of greener vehicles.
Disagree	The year of car should be taken away. Once the car is NCT and kept in a good condition the age of car should be scrapped
Disagree	There should be NO age limit on any SPSV vehicle. A valid NCT confirms that the vehicle is legally roadworthy. Buses don't have an age limits despite carrying over 90 passengers! It makes NO sense whatsoever and is blatant discrimination against SPSV owners forcing extra expense on the industry.
Disagree	These changes should extend life cycle of all taxis as those of us who have invested in newer vehicles over the years are also affected by loss of working hours and income.
Disagree	To alleviate hardship on drivers...the age limited should be extended.to 12 years on a permanent basis...
Disagree	To whom it may concern . After retiring from a career in the defence forces , I entered the taxi service industry . Since I started I always prided myself on a standard , and that is why I am on my third Mercedes . Top models should be 15 years on the road .
Disagree	Two NCT tests and a suitability twice no because all the local licence Hackneys have not to do a test for 3 years very unfair

Disagree	We have asked for a simple stay of execution for all vehicles as the pandemic has hit most operators hard with some not earning since March 2020..we feel this is a reasonable request to allow operators to continue working and not become a burden of the state.Andrea Boccarossa n.t.f.
Disagree	Why can't the vehicles be given a 2 years grace period as we are not in a financial position to change cab after 6years
Disagree	You have decimated the PSV industry with rules and regulations. Making a rural limousine over 9 years old have an NCT and suitability test every 6 months is disgraceful. I have been in this business for over 28 years but am now totally disillusioned by the antics of the National Transport Authority

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

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

