

Department for Transport Consultation Document

on

Increasing the Uptake of Eco-driving Training for

Drivers of Large Goods Vehicles and Passenger

Carrying Vehicles

A Response

by the

The Timber Transport Forum

The Timber Transport Forum is a voluntary partnership “working in partnership with communities, their representatives and the forest industry to promote a vibrant and sustainable timber transport sector and to secure social and environmental benefits.” Members comprise representatives from the Convention of Scottish Local Authorities, Forest Industries (Confederation of Forest Industries and UK Forest Products Association), Forestry Commission England, Scotland, Wales, Welsh Assembly Government, Welsh Regional Transport Consortia, Highland Council, North Yorkshire County Council, Rail Freight Group, Road Haulage Association, Scottish Enterprise, Scottish Government, and the Society for Chief Officers of Transportation in Scotland.

More details can be found at www.timbertransportforum.org.uk

Annex D: Consultation Response Form

Part 1: Information about you

Name	Roland Stiven
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Email	Roland.stiven@confor.org.uk
Company name or organisation (if applicable)	Timber Transport Forum http://www.timbertransportforum.org.uk
Please tick one box from the list below that best describes you/your company or organisation.	
☐	Small to Medium Enterprise (up to 50 employees)
☐	Large Company
☒	Representative Organisation
☐	Trade Union
☐	Interest Group
☐	Local Government
☐	Central Government
☐	Police
☐	Member of the public
☐	Other (please describe):

If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?

The response is submitted by the Timber Transport Forum. The 10 Timber Transport Groups (7 in Scotland, Cumbria, N. Yorkshire and Wales) have had an opportunity to input to the response. The groups incorporate local representatives of the forest industries, timber hauliers, local authorities and government agencies.

If you would like your response or personal details to be treated confidentially, please explain why.

Part 2: Your comments

1.

Do you agree with the proposed definition of eco-driving training – and, if not, why not? What changes do you propose? Is there anything else that should be included in the definition?

Please explain your reasons and add any additional comments you wish to make:

The Timber Transport Forum has prepared bespoke driver cpc training material for timber hauliers which we would expect to fall within the definition proposed. The course has not yet been delivered but is designed to improve the safe and fuel efficient driving techniques of timber haulage drivers. However, the course also aims to improve driver operational awareness relating to other aspects of timber haulage. These include:

- Safety aspects of timber haulage
- Vehicle craft
- Forest operations
- Crane operation
- Loading and strapping
- Road and 'off-tarmac' craft
- Delivery at site
- Information on the agreed route map system in operation for timber hauliers in different parts of the country.

The agreed route maps for timber haulage direct timber traffic to the most suitable roads and are a vital element in reducing the environmental and social impact of timber haulage. It therefore it makes sense to incorporate this in eco-safe courses.

Given that course content would need to be JAUPPT approved as meeting the criteria, we can see no need for the course name to be proscribed.

2.

How important a role do you think management of driver behaviour has in maintaining eco-driving training benefits and reducing carbon emissions more generally?

Please explain your reasons and add any additional comments you wish to make:

We would expect driver management to have a significant effect on the maintenance of eco-driving benefits e.g. fuel efficiency monitoring. Repeated training every 5 years should be encouraged.

3.

What can Government and non-Government organisations do to promote the improved management of driver behaviour?

Please explain your reasons and add any additional comments you wish to make:

Provide incentives relating to fuel management and efficiency by way of reduced taxation or other regulatory costs for those demonstrating fuel efficiency management. This and other fuel efficiency management measures could be linked to the delivery of a lorry road users charge.

4.

To what extent do you believe eco-driving training is currently being undertaken – and to what extent does this vary across small, medium and large firms? Please justify your answer, explaining why you believe this is the case.

Please explain your reasons and add any additional comments you wish to make:

The timber haulier driver training has yet to be rolled out so we have no figures for this. Most timber hauliers are small firms.

5.

To what extent do you believe that the rate of eco-driving training uptake will increase across small, medium and large firms in the future without additional action being taken by Government? Please justify your answer, explaining why you believe this is the case.

Please explain your reasons and add any additional comments you wish to make:

The main factor limiting driver uptake is likely to be the cost of providing the one to one in cab training required. This will limit uptake.

6.

If Option 2 is pursued, what promotional strategies do you suggest Government should consider, with particular focus on strategies aiming to reach smaller firms?

Please explain your reasons and add any additional comments you wish to make:

A significant proportion of timber hauliers are small firms of a few trucks working in remote rural areas. They may have little management capacity to pro-actively progress training and driver management approaches. There may be benefit in engaging more directly with these firms to develop management systems and training programmes, rather than expecting them to take up best practice through passive promotion. The Timber Transport Groups around the country do hold haulier events where training promotion can be undertaken but it is difficult to engage with rural hauliers.

7.

If Option 2 is pursued, what role do you think voluntary industry action, alone or in partnership with Government, should play in promoting the benefits?

Please explain your reasons and add any additional comments you wish to make:

8.

To what extent do you think elements of Option 2 would be required should Option 3 be the accepted approach?

Please explain your reasons and add any additional comments you wish to make:

9.

Do you agree that eco-safe driving training should be included as an eligible substitute for eco-driving training – and, if not, why not?

Please explain your reasons and add any additional comments you wish to make:

Yes and see response to qu 10.

10.

Do you agree with the inclusion and/or substance of the recommended structure proposed in relation to eco-driving training – and, if not, why not?

Please explain your reasons and add any additional comments you wish to make:

Yes but we would advocate significant flexibility within the course structure. The timber haulier training programme we have proposed is based on a SAFED approach but includes elements of safety in the forest, loading, strapping etc. i.e. all the processes a haulier would go through in the course of picking up and delivering a load of logs. The course allows the driver and the vehicle to undertake some 'work' during the training - probably delivering two loads of logs rather than the average three per day, reducing the net cost to the business.

There does need to be some flexibility in the proposed elements of the course. For example, most measures to improve aerodynamic performance are not appropriate for bespoke timber trucks and trailers which have open skeletal trailers and drive on unbound forest roads where fairings and side skirts would get damaged.

The agreed routes maps which are included in our training course serve to reduce damage to minor roads. This may have a beneficial impact on overall emission reductions comparable with savings through fuel efficiency and therefore has a place in eco-driving training.

11.

If Option 3 is pursued, do you agree with the proposed elements that eco-driving training should consist of – and, if not, why not?

Please explain your reasons and add any additional comments you wish to make:

See above

12.

If Option 3 is pursued, do you agree that eco-driving training should consist of seven hours and be undertaken in one training day – and, if not, why not?

Please explain your reasons and add any additional comments you wish to make:

It would be sensible to work with the existing Driver CPC parameters

13.

If Option 3 is pursued, do you agree that eco-driving training should only be mandated for periodic training, or should it be extended to the initial Driver CPC qualification?

Please explain your reasons and add any additional comments you wish to make:

14.

If Option 3 is pursued, do you agree that eco-driving training should be mandated to include PCV drivers – and, if not, why not?

Please explain your reasons and add any additional comments you wish to make: n/a

15.

If Option 3 is pursued, would you consider an enforced price cap on the amount charged for eco-driving training, or periodic training generally, to be appropriate – and, if so, why?

Please explain your reasons and add any additional comments you wish to make:

Assuming the training is to be provided by private sector training providers, we do not see how this could work. The specialist training course we hope to provide will be expensive to deliver, geared as it is to a relatively small market of rural firms dispersed throughout the UK. It may not be possible to deliver it through the commercial trainers if capped .

16. Which is your preferred option: Option 1, Option 2, Option 3, or none of these options?

Please explain your reasons and add any additional comments you wish to make:

None

17.

If none of the options proposed in the consultation document is your preferred option, what alternative option(s) should we consider – and, if so, why?

Please explain your reasons and add any additional comments you wish to make:

While we recognise the urgency of adopting measures to contribute to energy saving and GHC emissions reductions we believe that take up and long term effectiveness of eco-driving would be better achieved by incentivising active management by hauliers to train drivers and to monitor and reduce emissions.

18.

Do any of these options have an impact on the competitiveness of UK industry – and, if so, why?

Please explain your reasons and add any additional comments you wish to make:

19.

Do you agree with the draft Impact Assessment at Annex A – and/or can you help us to quantify more precisely the estimated costs and benefits?

Please explain your reasons and add any additional comments you wish to make:

20.

Do you agree with the estimates provided for average distance driven and fuel used for LGV and PCV drivers? Please note that the estimates used are annual averages for drivers across all types of vehicles.

Please explain your reasons and add any additional comments you wish to make:

Timber hauliers work on minor rural roads in the uplands and fuel consumption figures are generally substantially higher than for trunk road haulage

21.

Do you agree that eco-driving training has not been widely taken up by small firms in the past – and/or can you help us to quantify the number of small firms that have undertaken eco-driving training?

Please explain your reasons and add any additional comments you wish to make:

22.

Does your organisation operate any driver management systems?
What costs/benefits have resulted in driver management systems?

Please explain your reasons and add any additional comments you wish to make: n/a

23.

What impact do you think Option 2 would have on the uptake of eco-driving training? Is it feasible that additional promotion would attract small operators and we would reach our 90 per cent target – if so, by when?

Please explain your reasons and add any additional comments you wish to make:

24.

Are there alternative approaches for smaller firms, which would not materially affect the potential benefits from the policy?

Please explain your reasons and add any additional comments you wish to make:

See answer to Qu 17.

25.

Do you consider this consultation has been conducted in accordance with the Code of Practice on Consultation (Annex C)?

Please explain your reasons and add any additional comments you wish to make:

