

Cormac McKay's Submission to the Public Consultation

There has to be a recognition that the previous and our current government's policy up until this point has been a complete and utter abysmal failure! and have resulted in a delay in serious numbers for electric vehicle adoption in Ireland compared to other countries!

<https://www.rte.ie/news/environment/2024/0814/1464892-electric-car-sales/>

Also putting Ireland in one of the last places for EV public charging infrastructure availability and has led to the term [#ChargingInfrastructureAnxiety](#) entering the negative toxic media language lexicon and has probably contributed to EV's unwarranted poor reputation, poor adoption rates and lack of electric Shared Mobility vehicles compared to our European neighbours and therefore reinforcing the idea that people must have a fossil fuel powered car in Ireland, having one of the highest hybrid fossil fuel fleets per capita in Europe and citizens falsely thinking Hybrids are being more environmentally friendly by having one due to the Green Washing by motor companies whose hybrids have been proven to be more polluting.

<https://www.irishtimes.com/motors/2023/02/08/plug-in-hybrids-emitting-three-times-more-pollutants-than-claimed-report-finds/#:~:text=New%20research%20from%20Transport%20%26%20Environment,emissions%20for%20half%2Delectric%20cars&text=Anna%20Krajinska%20of%20T%26E%2C%20said.shows%20this%20is%20a%20myth.%22>

<https://thedriven.io/2024/07/29/hybrid-cars-can-be-nearly-five-times-dirtier-than-battery-electric-cars-new-report-finds/>

<https://theicct.org/publication/life-cycle-ghg-emissions-of-us-sedans-and-suvs-with-different-powertrains-and-fuel-sources-jul24/>

Unfortunately, the Advertising Standards Authority seems to think it's ok.

I refer to your complaint regarding advertising for Toyota.

The function of the Advertising Standards Authority is to ensure that advertisers comply with the requirements of the Code of Standards for Advertising and Marketing Communications in Ireland. We are prepared to investigate complaints concerning advertisements that may be considered to be in breach of the Code.

In the present case we note that the slogan 'Built for a Better World' has been in use by Toyota since 2016. While we note that you consider the slogan is an environmental claim, the slogan is a brand slogan for Toyota Ireland which encompasses more than just their hybrid vehicles and includes partnerships with various organisations such as Paralympics Ireland and initiatives around safety. While we appreciate your concerns, we do not consider that the brand slogan is in breach of the Code on the grounds raised.

We would like to thank you for taking the time to contact us.

Yours sincerely,

Seóna Parker.

Seóna Parker

Senior Services Manager

7 Herbert Street, Dublin 2, D02 K838

T 01 613 7040

www.adstandards.ie



Calls for banning fossil fuel and Hybrid vehicle advertising and Greenwashing going unanswered? by the Dail Public Petitions Committee and Irish Government and has been left to the opposition to bring a bill before the Oireachtas. <https://www.oireachtas.ie/en/bills/bill/2024/14/> and EU Directive [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2023\)753958](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2023)753958)



**Tithe an
Oireachtais
Houses of the
Oireachtas**

**An Comhchoiste um
Achainíocha ón bPobal**

Tithe an Oireachtais,
Teach Laighean,
Baile Átha Cliath 2
D02 XR20
Teil: (01) 618 3054
Ríomhphost: jcpp@oireachtas.ie

**Joint Committee
on Public Petitions**

Houses of the Oireachtas,
Leinster House,
Dublin 2
D02 XR20
Tel: (01) 618 3054
Email: jcpp@oireachtas.ie

22 June 2021

Your ref: P00019/21

Re: Petition No: P00019/21 "Ban on all fossil fuel and hybrid vehicles advertising on all Irish media."

Email: cormac325@gmail.com

Dear Mr McKay,

The Committee Secretariat working with the Joint Committee on Public Petitions acknowledges receipt of your petition in relation to "Ban on all fossil fuel and hybrid vehicles advertising on all Irish media."

Your Petition reference number is P00019/21, your petition is currently being processed by our Petitions Case Manager, and we will be in contact with you in due course.

Yours sincerely,

Susan Moran
Petitions Case Manager

We must realistically predict the coming advancements and changes in social norms that will come from the new technology and Shared Mobility that will be deployed on our streets **in the very near future** and is currently already deployed in other cities around the world which we should look to for inspiration,

 **Michael McGrath** ✓
@mmcgrathtd

Seeing lots of examples of innovation and technological advancement here in the 🇺🇸 west coast but the most interesting experience so far has been a trip in a @Waymo autonomous vehicle through the streets of San Francisco!



23:16 · 09 Jan 24 from San Francisco, CA · 4,273

That will deliver an environmentally, and socially beneficial Just Transition that is desperately needed for our individual transport provision and needs. We must not rely on people switching to traditional public transport which is still quite undesirable to many despite the minor improvements to current services.

<https://secureenergy.org/savs-sf-case-study/#:~:text=The%20latest%20case%20study%20from.impact%20are%20often%20disproportionately%20concentrated.>

I have a Post Graduate Cert, for Climate Entrepreneurship and a cert in SDG's and International Law. I have researched user behavior and transport requirements for individuals.

If we get this wrong the foundations of new government policy and ambitions could have serious ramifications, that could cost the taxpayer significantly and seriously further delay EV adoption (Like we did before promoting and depending on Diesel engines over Hybrids as a transitional technology) , something that resulted in thousands of deaths here in Ireland and around the world. A delayed EV adoption in transport would have similarly devastating effects to citizens' health and environmental damage.

www.rte.ie/lifestyle/motors/2017/0405/865457-former-green-minister-regrets-decision-to-promote-diesel-engines/

<https://www.europeandatajournalism.eu/the-dieselgate-and-air-pollution-in-europe/#:~:text=Approximately%2010%2C000%20people%20die%20prematurely%20in%20Europe%20each%20year%20due,premature%20deaths%20from%20diesel%20emissions.>

We will also be subjected to huge fines for missing our carbon reduction targets that are already off-track

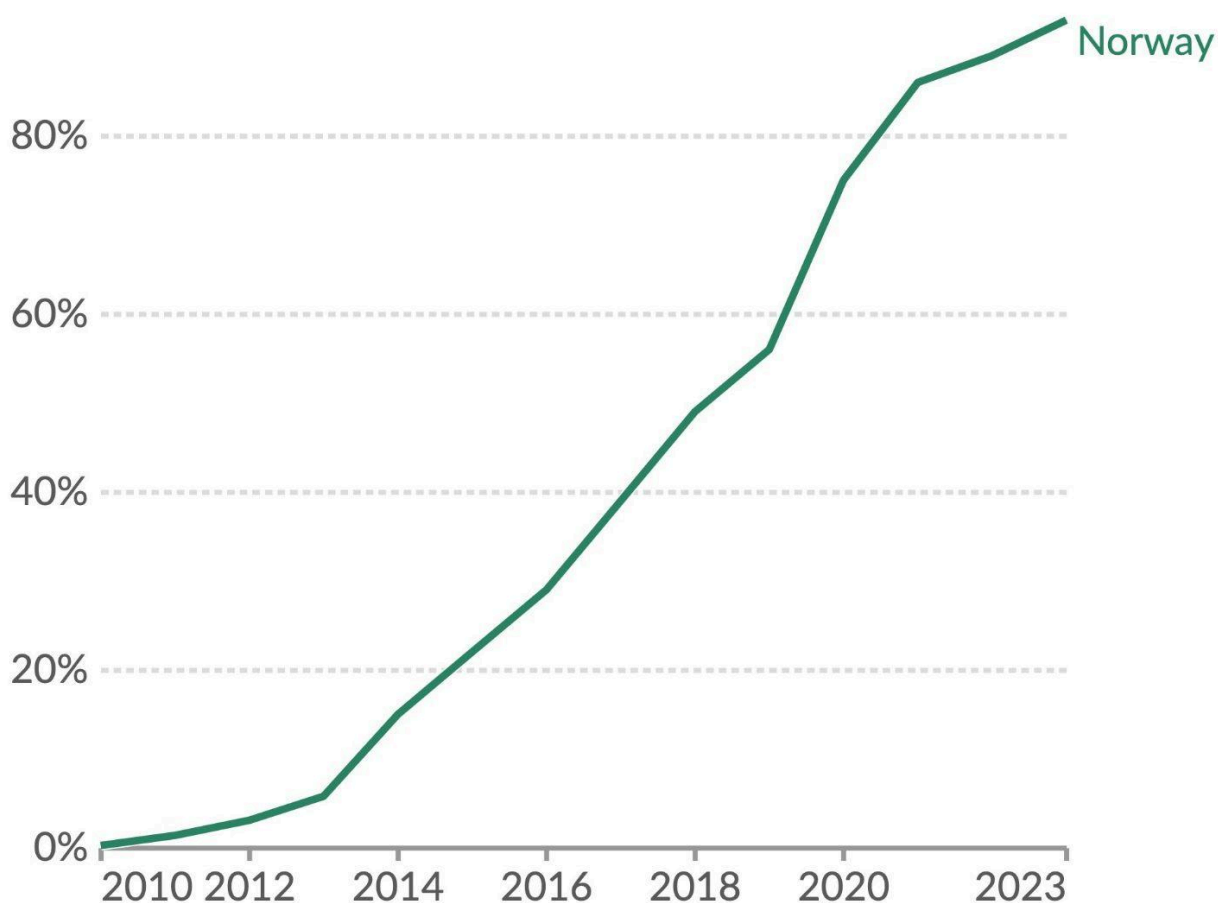
<https://www.irishtimes.com/environment/climate-crisis/2024/02/19/state-unlikely-to-meet-its-first-carbon-budget-and-faces-potential-multibillion-euro-compliance-costs/>

Previous and current government policy and ambitions on Transport and EV's are no longer valid and rely on outdated ideological ideas. The main point being, private car ownership is being promoted with an unrealistic, undesirable and quite possibly unachievable target of 800k+ EV's on Irish roads by 2030.

Grants and incentives for EV's are too low and are a very poor token gesture compared to other countries, resulting in some vehicles costing significantly more and expensive in Ireland, with Ireland currently being an outlier with the number one vehicle purchased still being a fossil fuel vehicle rather than an EV. Other countries have had much more ambitious goals of ending their fossil fuel vehicle sales by 2025 and will actually achieve this goal, transitioning to fully electric vehicles (ie Norway). Ireland unfortunately is still only getting started, due to poor policies and lack of grants and incentives.

Share of new cars sold that are electric, 2010 to 2023

Electric cars include fully battery-electric¹ and plug-in hybrids².



Data source: International Energy Agency. Global EV Outlook 2024. [OurWorldInData.org/energy](https://www.ourworldindata.org/energy) | CC BY

1. Fully battery-electric: Cars or other vehicles that are powered entirely by an electric motor and battery, instead of an internal combustion engine.

2. Plug-in hybrid: Cars or other vehicles that have a rechargeable battery and electric motor, and an internal combustion engine. The battery in plug-in hybrids is smaller and has a shorter range than battery-electric cars, so over longer distances, the car starts running on gasoline once the battery has run out.

This poor policy was probably the government's way of protecting revenue sources (Motor Tax, VRT and Vat), rather than actually wanting to speed up EV adoption in Ireland and because of this abysmal poor policy grants and incentives for EV's and in turn for the public and private charging infrastructure from the Government and taxpayers, studies have indicated they have mostly benefited wealthy households. Not conducive with a Just Transition?

<https://www.irishtimes.com/business/economy/2024/02/28/switch-to-electric-motoring-will-cost-exchequer-25bn-in-lost-tax-revenue-by-2030/>

www.irishtimes.com/news/environment/irish-electrical-vehicle-supports-benefit-the-wealthy-study-finds-1.4817841

The future of transport

Due to global events and protectionist policies by governments, there has to be a recognition that current ambitions and policies are now obsolete and unachievable and now recognized as undesirable.

We have to start using our limited resources including our man power hours and prioritise their use.

It would be my opinion that the government's target of one million / 850,000 EVs on Irish roads should be abandoned, and it is probably unachievable with the outbreak of world events and was never a sensible target to have in the first place. It is a poor policy encouraging further private car ownership when we should be prioritising Shared Mobility and public charging infrastructure.

I personally, and some domestic and international service providers have expressed to me that the sector of transport Shared Mobility and public charging infrastructure has been abandoned and neglected by the Irish government and local councils by policy! This in turn has led to the poor or complete lack of availability of services here. Unlike other European and international cities the type of services available and cost of said electric car-sharing services is not up to par or standard that would allow more people to give up a privately owned personal fossil fuel car and rely solely on free-floating electric car sharing services here. Current car-sharing services are just not practical, feasible, or affordable comparable to private car ownership and are not conducive with a Just Transition.

<https://cleantechnica.com/2019/02/05/green-mobility-bringing-400-evs-to-dublin-in-new-car-sharing-scheme/#:~:text=5%2C%202019%20%E2%80%8C-,Ireland%20is%20set%20to%20get%20some%20serious%20electric%20vehicle%20love.to%20drive%20an%20electric%20vehicle.>

Lack of public EV charging infrastructure being the reason for this company's delayed deployment here.

As much as I would also prefer people to walk, cycle, use E-mobility or public transport this is not always possible, safe, or legal to do so. Many genuinely have fear for their personal safety if they were to do so.

I have expressed a number of times that the poor design of cycling infrastructure that unfortunately have lead to unnecessary deaths may discourage people from cycling and even future proposed infrastructure has been deemed unsuitable and unsafe by some domestic and international cycling groups and may be delayed or completely rejected by An Bord Pleanála due to poor design and will further discourage cycling uptake in the city.

It has also been extremely disappointing, the delay in bringing forward legislation on E-Mobility, E-scooters and charging infrastructure to go with them that also discouraged the abandonment of private car ownership for many.

There also seems to be a reckless ignorance on why people fundamentally dislike, despise and fear our current public transport along with a lack of recognition that some people will never use said undesirable services and the promotion of doing so is an ideological one, that is already dividing public opinion into war-like camps, which may damage public transport adoption, political support, public funds allocation and support for a Just Transition. If you want to change behavior you have to provide a better service and should not be promoted as an unnecessary sacrifice of convenience and individual needs.

With this in mind, I hope the Irish government will bring forward better grants and incentives and encourage councils to provide them directly to local communities themselves. free-floating electric car-sharing services and public charging infrastructure should go with them because currently none exist due to poor policy and no grants and incentives available to vehicle manufacturers and fleet operators that only benefit the wealthy.

As spokesperson for Aeravai (Autonomous Electric Road & Air Vehicle Association of Ireland) with the objective of educating the Irish media, general public, businesses, politicians, and planners about current deployments around the world and how it would help with a Just Transition here and also to encourage international investment into Ireland and job creation and the promotion of the use of AV's here in Ireland in the near future, technology similar to what has already been deployed around the world.

I have contributed to the public consultation on autonomous vehicles in Ireland, unfortunately, public policy and charging infrastructure to go with them is still not known and is unclear. We have not been very progressive, with one CEO I met describing Ireland as a hostile location which may have cost us thousands of jobs. This is something I personally want to repair. I do plan on conducting my own trial on Irish roads as soon as possible and it would be my hope that the Irish government would be supportive of this, as an alternative to the Nation Transport Authority's "preferred bidders" vehicle selections. This would be an opportunity for the Irish government to promote the use of Autonomous vehicles, Shared Mobility, MaaS, and near-future technology that will hopefully encourage more people to give up privately-owned fossil fuel cars and help with a Just Transition. Many operators are waiting on UNECE/EU regulations that will supersede any Irish legislation before coming to Europe. This is a highly competitive space, which it is my hope we don't miss out on. RoboTaxi's and free-floating Autonomous car-sharing services will help speed up EV adoption and could be a more affordable and equitable transport for all. It has great potential to deliver a Just Transition.

<https://consult.nationaltransport.ie/ga/node/1390>

The average car is parked for 95% of its lifetime and is fast becoming a luxury many can no longer afford, especially Electric vehicles whose prices do not seem to be reducing any time soon. Parked vehicles, electric or not are stealing the urban realm, using up our precious limited carbon-intensive to produce resources, Glass, Steel, Aluminum, Copper, Plastic, Rubber and now increasingly lithium in the middle of an extreme supply chain crisis that we really don't have spare to waste, and may never have again with the current and future global protectionist relations and policies by governments.

My pre-budget proposal for degrowth within the motor industry and transport sector while still providing a desirable on-demand door-to-door SharedMobility service has now been accepted by Finance Minister Micheal McGrath TD and the opposition for the replacement of all current grants and incentives for Electric Vehicles.

[Aeravai Pre budget submission](#) link

It has been established that the current goal of 1 million electric vehicles on Irish roads by 2030 by the Irish government may not be the best policy choice, for a number of reasons with current grants and incentives for the encouragement of private electric car ownership studies here and around the world indicate that they have mainly benefited wealthy households not exactly conducive with a Just Transition, for a vehicle that is parked unused for much of its lifetime, using up carbon intensive to produce precious limited resource like Steel, Aluminium, Glass, Copper, Plastic, Rubber and now increasingly Lithium, with the price for said Electric Vehicles a luxury many can no longer afford or actually want to, outside the reach of much of the population with prices unlikely to fall any time soon even with cheaper Chinese models coming.

It is our hope they will consider this alternative more equitable Just Transition more Environmentally friendly alternative, in our Pre-Budget Submission on Transport and the much-needed potential benefits of Car Sharing and Ride Sharing with this to become much more practical and feasible with coming regulations to allow for the deployment of Autonomous and Remotely Piloted Vehicles on our roads that will soon come in all shapes and sizes being able to accommodate more passengers than just single occupant travel. It would also be my hope that the approval of specially designed Autonomous Vehicles designed without an onboard steering wheel and designed to accommodate more than 4 passengers and members of the DisAbility Community would be encouraged and subsidized by the Irish government to allow deployments here.

Lack of Transport is a cause of Loneliness which can badly affect our Mental Health
www.newstalk.com/news/loneliness-is-hugely-on-the-rise-alone-ceo-1511379

Because of the lack of availability, Cost, or Journey times on traditional public transport, if they have any at all. Yes it's not just in our older persons, in rural areas, but also younger people and those who are forced into the suburban sprawl they have to move to, due to historical poor planning, chronic vacant property in cities, affordability, and availability being major issues. Something we also hope to seriously address in this submission.

I am delighted that my proposed Citizens' Assembly for Dublin has finally taking place #CADublinMayor The CA recommended that complete control of transport and traffic policies for Dublin be devolved and removed from the National government of the day and The National Transport Authority and given to the Directly Elected Mayor. Transport and charging infrastructure for the GDA as the needs of Dublin transport users is and should be treated completely separately to national and rural users requirements Clear policies would give a clear indication of who has actual responsibility and accountability to the electorate and prevent pass the parcel of blame for lack of service provision and prevent further us against them attitudes and some damaging interference from some national rural politicians with vested interests.

What technology should we be pursuing, promoting and deploying?

1 Wireless charging

There are a number of players in this field and this is no longer, or should or be considered an experimental or emerging technology as described by a number of Irish government officials & media personalities, with a number of successful deployments by multiple operators around the world for a number of years.

Wave

Waveipt.com

WiTricity

Witricity.com

Momentumdynamics

momentumdynamics.com

Tesla Wireless (coming soon)

Other Israeli and Chinese wireless technologies should be avoided that may be subjected to import bans and political sensitivity.

To date no public funding has been provided for a trial for wireless charging deployment in Ireland?
No public tenders have been issued for wireless public charging?

Their use would be future proof and ideal for Shared Mobility and when Robotaxi's are deployed in the near future, a vehicle would be able to drive to a charger and charge itself with no human intervention.

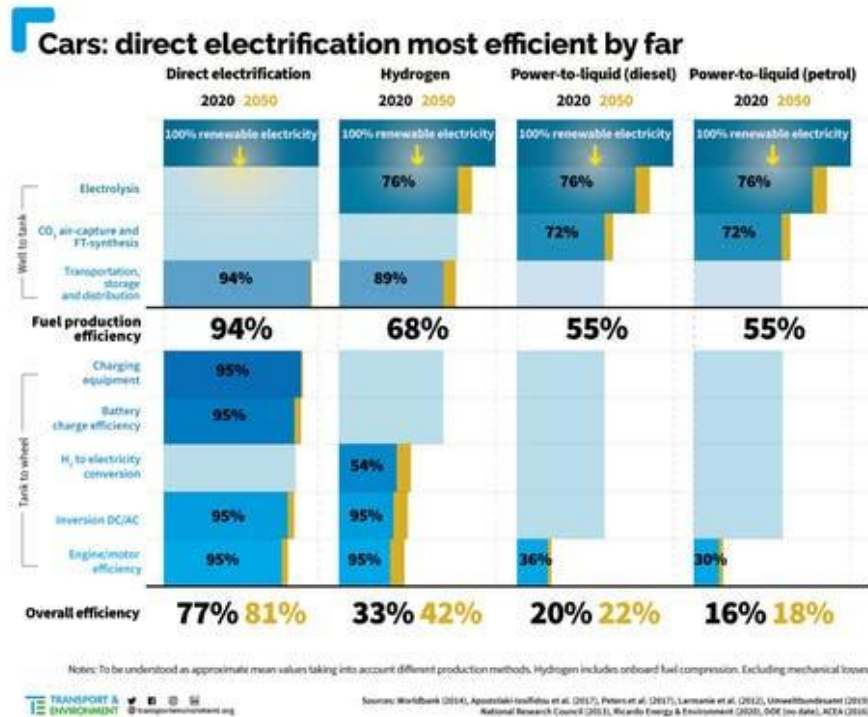
If we were to deploy the wrong electric vehicle public and private charging infrastructure technology now and in the near future by poor policy goals such as wired vehicle chargers, these will always need human intervention for a person to get out of the vehicle and put in the plug in to the vehicle to initiate charging the vehicle.

Picking the wrong technology could take up extra precious limited resources that will need replacing, outdated technology sooner rather than later, further taking up limited man hours, time and resources. We could end up replacing outdated equipment that was only just installed a few years previously.

Wireless charging is not just for small vehicles either they could be used for heavy duty vehicles as well, which would be far more economical and efficient than the poor use of Hydrogen in road transport, and would be a waste of Hydrogen when it is so badly needed for Heavy Industry that should be prioritised for Hydrogens use, to more rapidly decarbonise those heavy emitting carbon intensive industries.

Wireless charging could take place during loading and unloading times.

<https://insideevs.com/news/525428/wave-wireless-charger-tesla-semi/>



<https://insideevs.com/news/425972/momentum-dynamics-wireless-charging-efficiency/>

Free Floating Electric Car Sharing should be incentivised to be returned to a charging location for vehicle charging and V2G needs when needed.

This technology would be future proof as Robotaxi would be able to drive themselves to the charging location for vehicle charging and V2G needs.

This technology would be future proof as Robotaxi would be able to drive themselves to the charging location for vehicle charging needs.

Vehicle Battery to Grid V2G V2X

All future charging infrastructure and shared mobility vehicles should be capable or be capable of being upgraded to allow for all public and privately owned vehicles to become a giant reserve battery for renewable energy generated for the grid for general use and emergencies electric grid stabilisation and vehicle owners and fleet operators be compensated and given incentives for doing so.

Ring fenced renewable energy generated used for EV charging

Electric vehicles should be prioritised for renewable energy generated and delivered to the grid and that price should be set in the long term 10 years plus by the Energy Regulator and the CCPC, so they are protected from energy shocks that affect the fossil fuel energy market and ICE vehicles. It was extremely disappointing that this was not previously done and resulted in EV driver's being punished by fossil fuel energy market fluctuations quite severely. The ESB increased the various prices for charging electrified vehicles at its public charging points by as much as 53%.

<https://www.rte.ie/news/business/2022/0405/1290615-esb-to-increase-prices-for-public-ev-charging-point-s/>

Anti monopoly legislation

This may be needed for the use and costs of all private and public charging infrastructure.

Some operators already prevent other manufacturers vehicles from charging at their charging infrastructure. This should be prevented by law and price for charging should be set across the board of all providers by the Commission for Regulation of Utilities (CRU).

The government should not use vehicle charging prices as a revenue source for general taxation like it has done in the past with fossil fuel duty.

Solar Power at Mobility Hubs and Charging Locations

Public Mobility Hubs and Charging Locations should also contribute to the grid by having solar power.

Many of the public locations would be ideal for rapid solar deployment and should also be heavily subsidised by national and local governments to do so.

www.autofutures.tv/2022/05/27/eti-surrey-solar-car-park/

<https://reneweconomy.com.au/new-french-law-mandates-solar-panels-on-new-parking-lots/>

Existing Motor Dealers

Existing Motor Dealers could become ideal Shared Mobility hubs for public wireless charging, valeting and vehicle service departments as alternative to private vehicle sales and help with job transition and relocation of obsolete jobs to help with a Just Transition,

<https://electrek.co/2022/05/21/tesla-files-plans-for-diner-drive-in-theater-supercharger-on-santa-monica-bld-in-hollywood/>

In summary

For Cormac McKay's submission

- This is the foundation of future policy: pick the wrong one and it could be disastrous.
- Pursue only future-proof technology that promotes Shared Mobility and a Just Transition.
- Wireless charging technology should be that is technology pursued.
- Responsible use of our precious limited resources and allocation of man hours and skills
- Devolved responsibility to individual councils to provide public charging infrastructure.
- Set goals for councils to follow by national and devolved local governments.
- Only public charging infrastructure should be given realistic grants from taxpayers.
- Mobility Hubs and Charging Locations should be safe, secure places to stay and wait if necessary.
- Mobility Hubs and Charging Locations should be protected from anti-progress negative actions (icing etc).
- Anti-monopoly legislation on use and cost of all private and public charging infrastructure.
- Ring-fenced renewable energy generated used for EV charging at set price.
- long-term 10 years plus price controls on vehicle charging rates.
- V2G(Vehicle to Grid) incentives full market rate + for electricity provided back to the grid.
- Incentives for promoting shared use of privately owned charging infrastructure.
- Solar should be installed at charging infrastructure locations.