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FROM: Steven Birrell
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16 February 2004

SFDF response to Scottish Executive's Consultation on Exemption Regulations Under Section 54 of the Transport (Scotland) Act 2001 – (Road User Charging)

Summary

SFDF have made a formal response to the Scottish Executive's proposed draft regulations to be made under Section 54 of the Transport (Scotland) Act 2001. These regulations specify a national minimum exemption from road user charging schemes, and allow local authorities to set exemptions over and above that. Details of these regulations and the consultation's remit can be found in circular SCM-076-03, available from the document archive.

SFDF's response to this consultation has been included as Annex SCM-010-04-A1 for information.

For further details regarding this submission, please contact SFDF Director, Flora A McLean, flora.mclean@sdfd.org.uk

Steven Birrell
SFDF Secretariat

12 February 2004

Ms Kirsty Lewin
Road User Charging Regulations (s54)
Scottish Executive
Enterprise, Transport & Lifelong Learning Department
Transport Division 1
Area 2-D North
Victoria Quay
Edinburgh EH6 6QQ

Dear Ms Lewin,

ROAD USER CHARGING

CONSULTATION ON EXEMPTION REGULATIONS UNDER SECTION 54 OF THE TRANSPORT (SCOTLAND) ACT 2001

On behalf of the Scottish Food and Drink Federation (SFDF) I would like to thank you for the opportunity to comment on the Scottish Executive's draft regulations [to be made under section 54 of the Transport (Scotland) Act 2001], which seek to specify national minimum exemptions from road user charging schemes.

Background

As you will be aware, SFDF represents the common interests of food and drink manufacturing industry. We work to improve the environment in which the individual companies who make up the industry operate: be it legislative, economic, social or political. In so doing we aim to help maximise the competitiveness and profitability of the industry.

59,300 people are employed in the food and drink sector in Scotland (54,000 in food industry alone) – some 11.8% of total British food and drink sector employees. The industry in Scotland also accounts for annual sales of around £4.2 billion (exc. whisky).

Comments

SFDF's comments relate specifically to Question 1:

“Do you think that there should be any groups of people; classes of vehicles; or types of activity that we should include in our national minimum exemptions from road user charging schemes?”

* * * * *

- a) **SFDF would urge the Scottish Executive to extend the national minimum exemptions from road user charging schemes to include delivery vehicles of all types. Freight delivery – especially of food / drinks produce - is an essential service.**

By extending the national minimum exemptions to include freight / delivery vehicles, the Scottish Executive can ensure that future road user charging schemes are clearly focused on the very specific objective of reducing the incidence of congestion where and when it occurs, whilst at the same time ensuring the avoidance of unintended consequences such as damaging the competitiveness of Scottish businesses.

- b) **SFDF would urge the Scottish Executive to use the vehicle of a national “framework” to set appropriate and consistent parameters for minimum exemptions from road user charging schemes, with the aim of ensuring any future charging schemes do not have “unintended consequences” for business or act counter to other stated national objectives or initiatives.**

In acknowledging that congestion is in itself a cost on business and can give rise to particular problems for food and drink manufacturers / suppliers in terms of efficient and predictable delivery times for fresh and sometimes perishable products to customers, SFDF is generally supportive of the introduction of such measures as can be demonstrated to reduce the incidence of congestion, **on the proviso that steps are taken to avoid the unnecessary imposition of additional costs on business.**

Therefore, in the case of the Scottish Executive's stated objective of promoting a strong, successful and growing Scottish economy, SFDF is of the view that a national framework for charges and minimum exemptions is necessary to ensure such schemes do not automatically become an additional tax on business or work counter to wider economic objectives.

- c) Furthermore, it must also be borne in mind that some local authorities already impose restrictions on delivery times. Therefore, there is surely a clear-cut case for national minimum exemptions to at least ensure companies making deliveries during the permitted hours are protected from being further penalised by the imposition of a road user charge during the required / specified time slot.

- d) **Given the importance of the food and drink sector to the Scottish economy, SFDF would urge the Scottish Executive to instigate a detailed impact assessment of such schemes on the manufacturing sector in general and the food and drink industry in particular, before any future road user charging schemes are implemented.**

I trust that these comments will be taken into account and that SFDF will be kept informed of the outcome of the consultation process and further developments in this area.

Yours sincerely,

Flora A McLean
Director