



Dublin Chamber Submission on the Potential of E-Scooters as Urban Transport

December 2018

Introduction

Dublin Chamber is the representative body for over 1,300 members of the business community in the Greater Dublin Area and the largest Chamber of Commerce in Ireland.

Dublin Chamber strongly advocates for improved transport infrastructure for the capital and for implementing smart solutions in support of making Dublin a great city in which to live, work and do business. A recent Dublin Chamber survey shows that for 10% of employees in the Greater Dublin Area, commuting times and public transport is the most cited concern¹. We are of the position that e-scooters pose the possibility of adding a sustainable 'last mile' addition to the transport landscape of the city and can aid in the reduction of city centre traffic congestion without the need for major infrastructural spend by the Central Government.

For e-scooters to be supported in their introduction to the Dublin transport system, the necessary legal framework and safety guidelines need to be put in place with haste. Dublin Chamber argues that;

- E-scooters have the potential to be a sustainable and efficient addition to the urban transport landscape and should be supported.
- The lack of clarity on their legal use needs to be addressed with the necessary legal framework for this modern mode of transport.
- A clear set of guidelines to facilitate their safe usage in the city needs to be introduced.

These points are elaborated on further below.

Current Environment

There is currently a clear need for regulations and a clear system to support the legal use of e-scooters as a sustainable and environmentally friendly means of transport.

Viewed as a Mechanically Propelled Vehicle, Irish law enforcement is of the position that e-scooter users need insurance and road tax. As it stands, there is inconsistency on whether a member of An Garda Síochána will or will not stop someone for using an e-scooter as there is a lack of clarity on their

¹ Dublin Chamber Q3 2018 Business Outlook Survey

legal use. They may or may not be confiscated as law enforcement observes that such devices need to be taxed and insured². This position is drawn from the stipulations of the Road Traffic Act 1961 – Section 3(1) (a) + (b), a law that far precedes any semblance of e-scooter and smart technology and without any reference to it, but is applied in the context of the e-scooter as a Mechanically Propelled Vehicle, and this is supported by the RSA³.

However, it is argued by Dublin based e-scooter retailer Gyrowheel⁴, that e-scooters do not come under this regulation as it needs to be manually ‘scooted’ to start, similarly to e-bikes which also take a level of manual peddling to start the electrical power.

E-scooters vary in top speed, most however have a top speed of approximately 25-30kph, and are a sustainable form of transport powered as a rechargeable electric device. The Motor Taxation Office, when asked, stipulates that such devices are not heavy or fast enough to need insurance and tax. However, there is no written regulation for such devices⁵.

There are already rental services for e-scooters in Dublin, a company called Lifty operates a rental system, primarily e-scooters being rented out on a day by day basis⁶ targeting the tourism market. There are a number of e-scooter retailers in the city.

The current lack of directly applicable regulations and confusion between law enforcement, the Road Safety Authority and the Motor Taxation Office, will shut off the potential value of e-scooters as an additional mode of transport in urban centres.

International Indication

There are already e-scooters being used in Ireland, despite laws being unfavourable, though not directly applicable, to their use. Considering the tech industry in Dublin’s docklands and the accompanying international population of the area, the proliferation of e-scooter transport is likely. It is possible that this will be aided dramatically in the case of e-scooter sharing system being introduced to Dublin that is similar to that of Dublin Bikes but without docks and privately owned. This has been the case in tech cities in the US such as San Francisco and California. Dockless sharing e-scooters also need to be scooted to activate their power source.

The international trend towards e-scooter use and toward dockless electric scooter sharing suggests this mode of transport will continue to grow in popularity, especially in urban areas with a tech industry.

² An Garda Siochana FAQ <https://www.garda.ie/en/FAQs/>

³ RSA FAQ E-Bikes, Pedelecs, E-Scooters

http://www.rsa.ie/Documents/VS_Information_Notes/Two_Three_Wheeled_Vehicles/FAQs%20on%20E%20Bikes%20and%20Pedelecs%20and%20battery%20Scooters.pdf

⁴Gyrowheel <http://gyrowheel.ie/>

⁵ Gyrowheel <http://gyrowheel.ie/electric-scooters-skateboards-and-unicycles-officially-legal-in-ireland/>

⁶ Lifty <https://www.lifty.co/>

With Dublin's emergent reputation as an EMEA centre of the tech industry and as a Smart City, it would be wise to get ahead and take advantage of the opportunity this mode of transport poses.

US e-scooter companies are in a race for proliferation across Europe. Competition between companies Lime and Bird has spread from the US to European cities.

In the last 12 months, many cities in Europe have accepted an e-scooter sharing scheme. Two US start-up companies in particular are spreading at speed. Paris was the first European city in which a dockless scooter system was launched. Lime is now in Madrid, Berlin, Paris, Zurich, Frankfurt, Valencia and Bird is in Vienna, Brussels and Paris. In London, however, e-scooters came up against opposition as authorities have failed to engage and consider creating regulations for their use.

Considering the international experience of e-scooters in urban centres, further influx of the devices as 'last mile transportation' in Dublin is inevitable. The question now is if Government will put in place the regulatory environment to take advantage of the opportunity inherent in an e-scooter dockless system coming to Dublin or of it will fail to anticipate a city transport trend and possibly positive addition to the city's transport landscape.

Other cities have not had the opportunity or foresight to appropriately plan for the introduction of e-scooters to their urban landscape and felt the impact of it. Dublin, however, can take the opportunity to ensure that e-scooters are catered for and serve as a positive addition and not as a hindrance. Reports by *The Telegraph* inform that the UK is facing difficulty as antiquated road laws are causing issues with the introduction of planned and soon to be executed introductions of both Bird and Lime dockless e-scooters, making it more complicated and muddled than it needed to be⁷.

Recommendations

E-scooters pose a positive addition to the urban transport system. They are an environmentally friendly and efficient mode of transport.

Dublin Chamber would recommend that a simple permit system be put in place to allow for use of privately owned e-scooters and to clarify their position as a device that is not in need of tax and insurance. This system should be constructed in such a way to lend itself to a dockless e-scooter sharing system.

By regulating for the use of privately owned scooters and by getting ahead of a trend that is likely to arrive in Ireland by way of one, or more, dockless e-scooter systems, this technology can serve as a positive addition to the city. Such systems can and should be explored and taken advantage of as an addition to the transport system in support of alleviating traffic congestion.

⁷ The Telegraph, 7th December 2018 <https://www.telegraph.co.uk/technology/2018/12/07/electric-scooter-start-up-bird-plans-launch-three-uk-cities/>

Dublin Chamber also recommends that safety guidelines are put in place as to when and where they can be used in our road and pedestrian system.

If Dublin is to be a forward thinking and innovative city, it needs to take advantage of sustainable opportunities to make the city work better for its citizens.