 Regulatory Policy Committee	Validation of the One-in, Two-out Status and the Net Direct Impact on Business
Validation Impact Assessment (IA)	Extension to maximum tachograph downloading period
Lead Department/Agency	Department for Transport
IA Number	Not provided
Origin	Domestic
Expected date of implementation	SNR8
Date of Regulatory Triage Confirmation	Not applicable – Red Tape Challenge
Date submitted to RPC	19 June 2014
Date of RPC Validation	22 July 2014
RPC reference	RPC14-DfT-2137
Departmental Assessment	
One-in, Two-out status	OUT
Estimate of the Equivalent Annual Net Cost to Business (EANCB)	-£0.93 million
RPC assessment	VALIDATED
<p>Summary RPC comments</p> <p>The Validation IA is fit for purpose. The IA states that it is a deregulatory proposal (an ‘OUT’) with an estimated EANCB of -£0.93 million each year. Based on the information provided, the RPC can validate this figure.</p> <p>Business will benefit from the time saved from not having to download data from the tachograph on vehicles as often as currently required. This will save vehicle operators affected by the legislation one hour in download time per year on average, leading to direct net cost savings to business.</p>	
<p>Background (extracts from IA)</p> <p>What is the problem under consideration? Why is government intervention necessary?</p> <p><i>“It is an EU requirement that tachograph records from Heavy Goods Vehicles (HGV) and Passenger Services Vehicles (PSV) are downloaded by the operator at 90-day intervals. Currently, we are goldplating these requirements by requiring data to be downloaded every 56 days. Following the Red Tape Challenge and a consultation, it has been decided to adopt the maximum 90 days allowed under EC Regulation 561/2006. Government action is required in order to change current domestic regulations stipulating a 56 day interval.”</i></p>	

What are the policy objectives and the intended effects?

“Operators involved in long international journeys and tours over 56 days can find it difficult to comply with the current download period limit of 56 days. This change will give them longer to comply and alleviate the problems they currently encounter trying to download the data whilst abroad. Operators who maintain their vehicles at longer intervals than 56 days will also benefit, as they would be able to schedule downloads alongside their maintenance check-ups. The change will save lorry and coach operators time. All Operators will benefit from increased flexibility about when they carry out their download.”

RPC comments

The proposal allows operators of heavy goods vehicles to download tachograph data at 90-day rather than 56-day intervals, in line with EC Regulation 561/2006. Tachographs are devices that record each driver's driving time in real time. Operators have to ensure that they download data from the tachograph as legally stipulated. For many operators, this means having to bring vehicles in from the road more often – outside routine vehicle maintenance cycles - than if the download interval was the maximum of 90 days allowed under EU requirements.

The proposed legislation only affects vehicles with a maintenance interval of between 9 and 13 weeks (13 weeks being the maximum permitted). Most vehicles with a maintenance interval of less than 9 weeks already download tachograph data more often than the current requirement of 56 days, meaning the extension to 90-days will have no impact.

For vehicles within the 9-13 week range, the Department assumes that operators will minimise the time spent performing downloads by choosing one of two strategies;

- i) two downloads per maintenance cycle (one during the maintenance check, and one manually in the intervening weeks); or
- ii) a manual download at the required interval, except where it coincides with a scheduled maintenance check.

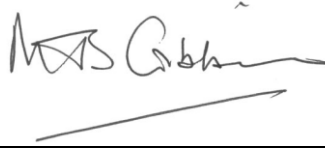
Which strategy is optimal depends on the maintenance interval of the vehicle in question. The Department assumes the vehicle operator will choose the strategy of least cost. Figures for the time saved per vehicle per year from a 90-day versus a 56-day download interval result from this assessment.

The Department calculates the direct benefit to business by multiplying the time saved in downloading data per vehicle per year for each maintenance interval in question by the cost of vehicle mechanics' time, and the number of vehicles affected by the legislation. The Department acknowledges that there will also be some savings to operators from no longer needing to travel to facilities to download tachograph data as often as currently required.

However, it has not attempted to monetise this saving as there is insufficient data to make robust estimates. The RPC accepts that this is proportionate.

The method and calculations appear to be robust. Therefore, the RPC can validate the EANCB figure of -£0.93 million.

Signed

A handwritten signature in black ink, appearing to read "Michael Gibbons", with a long horizontal stroke extending to the right.

Michael Gibbons, Chairman