Subsidy Advice Unit Report on the proposed subsidy to CalMac Ferries Limited

Referred by Transport Scotland

17 December 2024

Subsidy Advice Unit

Part of the Competition and Markets Authority

CONTENTS

1. The Referral

1.1 On 30 October 2024, Transport Scotland requested a report from the Subsidy Advice Unit (the SAU)[1] in relation to the proposed subsidy to CalMac Ferries Limited (CalMac) (the Subsidy) under section 52 of the Subsidy Control Act 2022 (the Act).[2]

1.2 This report evaluates Transport Scotland's assessment of compliance (the Assessment) of the Subsidy with the requirements of Chapters 1 and 2 of Part 2 of the Act.[3] It is based on the information and evidence included in the Assessment.

1.3 This report is provided as non-binding advice to Transport Scotland. It does not consider whether the Subsidy should be given, or directly assess whether it complies with the subsidy control requirements.

Summary

1.4 The Assessment uses the four-step structure described in the Statutory Guidance for the United Kingdom Subsidy Control Regime (the Statutory Guidance) and as reflected in the SAU's Guidance on the operation of the subsidy control functions of the Subsidy Advice Unit (the SAU Guidance).

1.5 In our view, the Assessment clearly describes and evidences both the Subsidy's policy objective of ensuring the continued provision of lifeline ferry services to island/peninsula communities and its equity objectives of tackling the inequalities faced by these communities.

1.6 However, we have identified the following areas for improvement:

(a) To the extent that Transport Scotland wish to rely on a market failure argument (as well as the strong equity rationale that it sets out), the Assessment should better demonstrate the existence of positive externalities, notably by explaining how the subsidy will achieve a more efficient outcome by describing the additional economic spillovers that would be created by providing a lifeline ferry service that is accessible, reliable, convenient and which provides resilience to island/peninsula communities (Principle A).

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[1] The SAU is part of the Competition and Markets Authority.
[2] Referral of the proposed subsidy to CalMac Ferries Limited by Transport Scotland - GOV.UK
[3] Chapter 1 of Part 2 of the Act requires a public authority to consider the subsidy control principles and energy and environment principles before deciding to give a subsidy. The public authority must not award the subsidy unless it is of the view that it is consistent with those principles. Chapter 2 of Part 2 of the Act prohibits the giving of certain kinds of subsidies and, in relation to certain other categories of subsidy creates a number of requirements with which public authorities must comply.

(b) the Assessment should better demonstrate that Transport Scotland considered a range of alternatives to the subsidy and explain, with appropriate evidence, why it concluded that they were not suitable to achieve the policy objective (Principle E).

(c) the Assessment of the counterfactual should be more granular and include a route-by-route assessment examining whether any level of service could be commercially provided, when allowing for variations in price and frequency (Principle C).

(d) On proportionality (Principle B), the Assessment should further explain and evidence:

(i) the extent to which the leasing and maintenance costs by CalMac for the use of Caledonian Maritime Assets Limited's (CMAL) ferries (see paragraph 1.10) and the costs paid to CMAL by CalMac to fund the purchase of new ferries are the minimum necessary amount to achieve the policy objective;

(ii) whether bundling the network ensures that the Subsidy is proportionate to the policy objective and limited to the minimum necessary. This could include cost modelling of unbundled routes, which might permit more efficient business models; and

(iii) why an open competitive tender would not allow the policy objective to be met with a lower level of subsidy. This could include, for example, market testing with potential operators who might bid for the 10-year Clyde and Hebrides Ferry Services (CHFS) contract, and benchmarking of how costs compare across ferry services in Scotland.

(e) the Assessment should more systematically set out and evidence potential competition and investment impacts of the Subsidy, drawing on the relevant parts of the Statutory Guidance (Principle F).

(f) the Assessment should more fully set out and explain the intended benefits of the Subsidy, including qualitative assessment where necessary (Principle G).

(g) the Assessment should better explain how Transport Scotland will ensure that the greater flexibility to adjust service level in the lifetime of the contract remains consistent with the transparency requirements of Section 29 of the Act.

1.7 We discuss these areas below, along with other issues, for consideration by Transport Scotland in finalising its assessment.

The referred subsidy

1.8 Transport Scotland is proposing to provide a subsidy to CalMac to deliver the CHFS between the neighbouring islands and the mainland. The estimated total subsidy is £3.7 billion over a period of 10 years, calculated on the basis of cost estimates of providing the lifeline ferry services over that period. Transport Scotland considers the Subsidy to be for a service of public economic interest (SPEI).

1.9 The CHFS network comprises over 30 ferry routes (covering over 50 destinations) on the west coast of Scotland to 24 islands and 5 peninsula communities. Ferry services play an important role in linking communities to neighbouring islands and to the mainland, facilitating access to education, healthcare and other services. CalMac is the operator of the current CHFS contract (second CHFS contract) and receives subsidy from Transport Scotland.

1.10 CMAL owns the vessels and 25 harbours serving the CHFS network. It leases 32 vessels to CalMac, which is responsible for associated costs for the maintenance and operation of the vessels. CMAL pays harbour maintenance fees to CalMac.

1.11 Transport Scotland decided to restructure the current governance and delivery arrangements for the third CHFS contract and to award a direct contract to CalMac to deliver the services as a SPEI.[4] Transport Scotland explained that the governance arrangements under the third CHFS contract will change materially due to the requirements of the direct award pursuant to the Teckal exemption. The Teckal exemption is a legal concept that allows contracting authorities to award contracts to legal entities under their control without being subject to procurement rules. It is often referred to as the in-house exemption.

1.12 Transport Scotland anticipate that the new governance arrangements will help change the ethos of the service by shifting the focus from a commercial arrangement to a model more focused on the delivery of a public service and help deliver strategic objectives. They explained that this will potentially afford greater flexibility for Ministers to adjust service levels than with a contract which has been awarded pursuant to a competitive tender process.

1.13 Transport Scotland explained that the Subsidy is a Subsidy of Particular Interest because it exceeds £10 million in value.

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[4] Pursuant to the exemption for "in-house" contractual arrangements provided for in Regulation 13(1) of the Public Contracts (Scotland) Regulation 2015 (as amended) (the Teckal Exemption).

2. The SAU's Evaluation

2.1 This section sets out our evaluation of Assessment, following the four-step structure used by Transport Scotland.

Step 1: Identifying the policy objective, ensuring it addresses a market failure or equity concern, and determining whether a subsidy is the right tool to use

2.2 Under Step 1, public authorities should consider compliance of a subsidy with:

(a) Principle A: Subsidies should pursue a specific policy objective in order to remedy an identified market failure or address an equity rationale (such as local or regional disadvantage, social difficulties or distributional concerns); and

(b) Principle E: Subsidies should be an appropriate policy instrument for achieving their specific policy objective and that objective cannot be achieved through other, less distortive, means.[5]

Policy objectives

2.3 The Assessment states that the policy objective of the Subsidy is to ensure that the island/peninsula communities on the CHFS network are provided with a lifeline ferry service that is accessible, reliable, convenient and which provides resilience to those communities. It states that the Subsidy will drive innovation and efficiency, support the transition to net zero and secure value for money whilst ensuring the accessibility and resilience of ferry services is maintained.

2.4 In our view, the Assessment clearly describes and evidences the specific policy objective of the Subsidy, articulates the underlying reasons for its policy aims, and explains how it supports Transport Scotland's wider strategic agenda.[6]

Market failure

2.5 Market failures arise where market forces alone do not produce an efficient outcome. When this arises, businesses may make investments that are financially rational for themselves, but not socially desirable.[7]

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[5] See Statutory Guidance, paragraphs 3.32 to 3.56 and the SAU Guidance, paragraphs 4.7 to 4.11 for further detail.
[6] Including Transport Scotland's draft Vessel and Ports Plan and Island Connectivity Plan.
[7] Statutory Guidance, paragraphs 3.35-3.48.

2.6 The Assessment describes a market failure of positive externalities related to the wider economic and social benefits that accrue to residents of the communities served by the CHFS network, for which the service provider is not compensated when delivering the service.

2.7 The Assessment explains that these positive externalities consist of:

(a) addressing income inequality between the islands and the mainland by ensuring islanders avoid the otherwise significant transport costs in the absence of the subsidised ferry service;

(b) tackling potential depopulation, which challenges the viability of communities, businesses and services due to limited access to people, by ensuring island communities have accessible, reliable, and convenient lifeline ferry services;

(c) providing reliable and regular routes to get goods to and from market on the mainland; and

(d) ensuring that island communities have access to healthcare and education services.

2.8 For a subsidy to address positive externalities it should make the overall market outcome more efficient,[8] increasing overall welfare and social benefits,[9] by internalising external benefits that commercial operators would not otherwise account for in making their decisions on what services to supply. This is distinct from addressing disparities between different groups or areas in society, such as the reduction of geographical inequalities, which would not necessarily lead to improved market efficiency and is better framed as an equity argument.

2.9 In our view, the Assessment does not adequately explain why the outcomes that it intends to achieve through the Subsidy address positive externalities. To the extent that Transport Scotland wish to rely on positive externality arguments, the Assessment should explain how the subsidy will achieve a more efficient outcome by describing the additional economic spillovers[10] that would be created by providing a lifeline ferry service that is accessible, reliable, convenient and which provides resilience to island/peninsula communities.

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[8] An efficient outcome is defined as a situation where no one can be made better off without making someone else worse off. In effect the outcomes for a group or society at large are maximised.

[9] In economic terms 'Social benefits' refer to the total benefits that a society or community receives from a particular economic activity. It is calculated as the sum of private benefits and external benefits (positive externalities).

[10] For example, a more highly educated society tends to be more productive and boosts the capacity to create new knowledge, products, and technologies.

Equity Objective

2.10 Equity objectives seek to reduce unequal or unfair outcomes between different groups in society or geographic areas.[11]

2.11 The Assessment describes the following inequalities between island/peninsular communities on the CHFS network, and communities elsewhere in Scotland:

(a) income inequality: higher cost of living in island and rural communities compared to the Scottish or UK mainland, including transport and household costs, lead to income inequalities;

(b) demographic inequality: depopulation remains a credible risk for areas served by the CHFS network with islands and remote rural areas expected to see the steepest reductions in the child and working-age population, leading to significant challenges for the viability of communities, businesses, and services due to limited access to people. The anticipated loss of the working-age population in the islands is expected to be disproportionately higher than the overall population decline;

(c) economic development inequality: many islands are both importers and exporters of goods and (unlike non-island communities) they rely on frequent ferry services to get goods to market; and

(d) social service provision to island communities: the challenges of social service provision to island communities and the network's role in facilitating access to essential services like healthcare and education.

2.12 In our view, the Assessment clearly describes and evidences the equity objective that the Subsidy seeks to address and articulates how the inequalities identified align with those recognised in wider Scottish Government policy.

Appropriateness

2.13 Public authorities must determine whether a subsidy is the most appropriate instrument for achieving the policy objective. As part of this, they should consider other ways of addressing the market failure or equity issue.[12]

2.14 The Assessment explains that Transport Scotland has considered the following means to achieve the policy objective:

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[11] Statutory Guidance, paragraphs 3.49-3.53.
[12] Statutory Guidance, paragraphs 3.54-3.56.

(a) unbundling the routes currently grouped together in the CHFS network. This was discounted because it was deemed more expensive to operate, would negatively impact the reliability of services and there would be no market interest in operating a route without a subsidy; and

(b) competitively tendering the third CHFS contract. This was discounted as previous CHFS competitive procurements have failed to generate strong interest from the market and an open competition of this nature will require the commitment of substantial senior executive resource within CalMac and significant consideration at Board level.

2.15 The Assessment states that 'non subsidy' options were discounted. It argues that it would not be economically viable for a private sector provider to operate the routes on a commercial basis and therefore, no services would be provided absent some form of subsidy.

2.16 We note that the supporting evidence provided alongside the Assessment discusses other alternatives to achieve the policy objective including enhanced regulation, structural reform, and decentralisation. Transport Scotland concluded these were not viable alternatives.

2.17 In our view, given the size of the Subsidy, the Assessment should better demonstrate that Transport Scotland considered a range of alternatives and explain, with appropriate evidence, why it concluded that they were not suitable to achieve the policy objective. This should include consideration of the potential for different models of delivery across some / all routes.

Step 2: Ensuring that the subsidy is designed to create the right incentives for the beneficiary and bring about a change

2.18 Under Step 2, public authorities should consider compliance of a subsidy with:

(a) Principle C: Subsidies should be designed to bring about a change of economic behaviour of the beneficiary. That change should be something that would not happen without the subsidy and be conducive to achieving its specific policy objective; and

(b) Principle D: Subsidies should not normally compensate for the costs the beneficiary would have funded in the absence of any subsidy.[13]

[13] See Statutory Guidance, paragraphs 3.57 to 3.71 and the SAU Guidance, paragraphs 4.12 to 4.14 for further detail.

Counterfactual

2.19 In assessing the counterfactual, public authorities should consider what would likely happen in the future – over both the long and short term – if no subsidy were awarded (the 'no subsidy' scenario).[14]

2.20 The Assessment sets out a counterfactual scenario where, in the absence of a subsidy, the CHFS network would not be commercially viable and therefore CalMac would not be able to provide services to the network as it would not earn sufficient revenue to cover the operational costs. The Assessment relies on a range of evidence to support this, including a draft cost estimate model prepared by external consultants, profitability analysis for one year of the second CHFS contract, and the Strategic Approach Paper of the Islands Connectivity Plan.

2.21 The Assessment further articulates that other private sector operators would be unlikely to take on service provision for the CHFS network without subsidy because of the associated losses. It argues that they would likely have to increase ferry fares and/or reduce the frequency and number of routes to be serviced for the network to be commercially viable.

2.22 The Assessment explains that previous CHFS competitive procurements failed to generate strong interest from the market, as only two bids were received for the second CHFS contract, one of which was not considered to meet the criteria.

2.23 The Assessment also sets out that a market analysis undertaken as part of an exploration of the option to extend the second CHFS contract for 2-years concluded that it would be unattractive to the private sector. Transport Scotland however accepted that a longer-term contract would provide a greater incentive.

2.24 In our view, the analysis of the counterfactual should be more granular and include a route-by-route assessment examining whether any level of service could be commercially provided on each route, when allowing for variations in price and frequency.

2.25 The counterfactual should consider fluctuation of demand throughout the year and differentiate as appropriate between freight and passenger transport volumes, costs and profitability. This would help inform the extent to which some or all of the network services could be provided by private operators, whether these would be provided at an affordable price for the island population.

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[14] Statutory Guidance, paragraphs 3.60-3.62.

2.26 In our view, a more granular counterfactual would also constitute a more suitable basis to consider proportionality and the impact of the Subsidy on competition and investment.

Changes in economic behaviour of the beneficiary and additionality

2.27 Subsidies must bring about something that would not have occurred without the subsidy.[15] They should not be used to finance a project or activity that the beneficiary would have undertaken in a similar form, manner, and timeframe without the subsidy ('additionality').[16]

2.28 The Assessment states that the Subsidy will change CalMac's economic behaviour by directly compensating for the network service delivery that would otherwise be unprofitable. It explains that Transport Scotland intend to develop and put in place a third CHFS contract underpinned by robust Key Performance Indicators (KPIs) and an associated monitoring regime.

2.29 This contract will set out a specification of services and stipulate CalMac's use of vessels, harbour and pier dues to be paid, crewing arrangements and fares it can charge. It will ensure that CalMac provides the communities forming the CHFS network with a lifeline ferry service that is accessible, reliable, convenient, adequately resilient and that represents value for money.

2.30 In our view, the Assessment explains and evidences how the subsidy would influence CalMac's economic behaviour. However, the shortcomings identified above in the counterfactual impacts the assessment of additionality, as the Assessment should consider in a more granular way what services CalMac would have funded absent the subsidy.

Step 3: Considering the distortive impacts that the subsidy may have and keeping them as low as possible

2.31 Under Step 3, public authorities should consider compliance of a subsidy with:

(a) Principle B: Subsidies should be proportionate to their specific policy objective and limited to what is necessary to achieve it; and

(b) Principle F: Subsidies should be designed to achieve their specific policy objective while minimising any negative effects on competition or investment within the United Kingdom.[17]

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[15] Statutory Guidance, paragraph 3.64.
[16] Statutory Guidance, paragraphs 3.63-3.67.
[17] See Statutory Guidance paragraphs 3.72 to 3.108 and the SAU Guidance, paragraphs 4.15 to 4.19 for further detail.

Proportionality

2.32 The Assessment outlines several features of the Subsidy that contribute to keeping it to the minimum necessary and proportionate to the policy objective. These include details on the relative size of the Subsidy, the fact that CalMac will need to adhere to an externally commissioned cost model and will not be profit making, the timespan of the Subsidy, monitoring and ringfencing provisions, and contractual obligations, including the use of KPIs, that will require CalMac to use all resources economically, effectively and efficiently.

2.33 The Assessment states that ‘unbundling’, ie disaggregating the CHFS network into single routes or several smaller groupings of routes, would not help to limit the size of the subsidy while allowing it to meet the policy objective because it would result in a loss of economies of scale, with an operator needing to apportion overheads and vessel resilience capability across fewer routes.

2.34 The Assessment and supporting evidence also show that Transport Scotland considered an open competitive tender for the third CHFS contract, rather than a direct award to CalMac, but that Transport Scotland decided against this because:

(a) only two operators bid for the previously tendered contract, one of which was non-compliant;

(b) there was limited evidence of interest in the CHFS network from any other operator (see paragraph 2.22).

(c) a private operator would require a profit margin in addition to the costs of providing the services so the direct award will likely be more cost efficient;

(d) it would create additional costs and delays; and

(e) a direct award to CalMac would deliver strategic objectives via a body owned by Scottish Ministers and provide greater flexibility for them to adjust service levels during the lifetime of the contract.

2.35 In our view, the Assessment sets out some elements of the Subsidy’s design which are relevant to proportionality, with supporting evidence in line with the Statutory Guidance. However, we consider that the Assessment should further explain and evidence:

(a) the extent to which the leasing and maintenance costs by CalMac for the use of CMAL’s ferries (see paragraph 1.10) and the costs paid to CMAL by CalMac to fund the purchase of new ferries are the minimum necessary amount to achieve the policy objective;

(b) why unbundling the network would not have reduced the size of the Subsidy. This could include cost modelling of unbundled routes which might permit more cost-efficient business models.

(c) why an open competitive tender would not allow the policy objective to be met with a lower level of subsidy. This could include, for example, market testing with potential operators who might bid for the 10-year third CHFS contract, and benchmarking of how costs compare across ferry services in Scotland.

Design of subsidy to minimise negative effects on competition and investment

2.36 The Assessment sets out several design features of the Subsidy which are relevant to minimising distortive impact (in addition on the features mentioned above), including the breadth of potential beneficiaries, selection process, the nature of the subsidy, performance and evaluation.

2.37 In our view, the Assessment demonstrates and evidences how some design features of the subsidy contribute to minimising any negative effects of the Subsidy on competition and investment within the United Kingdom.

2.38 However, we consider that the Assessment should better support and evidence its view that alternative business models, in particular unbundling and an open tender, would be more costly overall and/or would not allow Transport Scotland to meet the policy objectives as effectively. Specifically, it should demonstrate that an open tender process for smaller bundles or individual routes would not have been potentially more attractive to private operators.

Assessment of effects on competition or investment

2.39 The Assessment states that the impact on competition of the Subsidy is likely to be limited because:

(a) there are few (if any) competitors to the CHFS;[18]

(b) Transport Scotland is not aware of any ferry services with comparable frequency and nature of services to CalMac as part of the CHFS network;

(c) there is limited evidence of interest from commercial operations in routes forming the network;

[18] Although we note that several competitors are mentioned in other sections of the Assessment/supporting evidence.

(d) competition is unlikely to arise, which is demonstrated by the CHFS network needing a significant previous subsidy; and

(e) while the subsidy covers a significant proportion of CalMac's predicted costs, the cost model minimises risk that any distortive impact of the subsidy contributes to anything beyond what is required to meet the policy objectives, with CalMac receiving no profit or other revenues which could be used to fund activities in other areas.

2.40 In our view, the Assessment does not sufficiently consider and evidence the effect of the Subsidy on competition and investment in the UK, in line with the Statutory Guidance. It should more systematically set out and evidence potential competition and investment impacts, drawing on the relevant parts of the Statutory Guidance[19] by:

(a) Identifying the geographic and service markets that the Subsidy will be impacting. In particular, the Assessment should consider the local transport markets which would be impacted.

(b) considering, within the impacted markets, the set of current competitors (ie alternatives to each ferry route such as air routes) or potential competitors (such as private ferry operators in Scotland) that may be affected.

(c) considering the impact of the Subsidy, and the historic subsidies for CHFS, on barriers to entry and expansion in the identified impacted markets.

(d) considering the potential impacts of the Subsidy on related or input markets, (such as considering the impact caused by funding the purchase and maintenance of ferries given these costs contribute to a large proportion of Subsidy).

Step 4: Carrying out the balancing exercise

2.41 Step 4 consists of an evaluation of the Assessment against Principle G of subsidy control, which states that in terms of achieving the stated policy objective, the beneficial effects of the subsidy should outweigh any negative effects, particularly when they affect a) competition or investment within the United Kingdom or b) international trade and investment.

2.42 The Assessment states that the Subsidy will deliver Transport Scotland's objective of providing the communities making up the CHFS network with a lifeline ferry service, which is an important policy objective for Scottish Ministers. It explains

[19] Paragraphs 3.76 to 3.108 and Annex 3 of the Statutory Guidance.

that the Subsidy will address likely market failure as these services would not be provided without an appropriate subsidy, leading to communities in the CHFS network area missing out on positive externalities that the current subsidised ferry services bring to the area. The Assessment explains that, whilst Transport Scotland is unable to quantify precisely the overall benefits of the third CHFS contract, it considers them to be considerable, and that they include the delivery of the equity objectives set out in Step 1. It argues that any negative effects would need to be significant to outweigh them.

2.43 The Assessment states that negative impacts are likely to be limited to private sector operator(s) who might have been interested in tendering to deliver services on the CHFS network and cannot do so. It explains that in Transport Scotland's view there would be limited appetite from other operators to deliver the third CHFS contract, and that unbundling the routes would not be realistic.

2.44 In our view, the Assessment should set out in further detail the intended benefits of the Subsidy and their scope, including qualitative assessment where necessary. Transport Scotland should also revisit the balancing exercise having considered our advice in Step 3, taking into account any negative effects that the Subsidy is likely to have, in particular on competition and investment within the UK.

Other Requirements of the Act

2.45 Transport Scotland has identified that the Subsidy would engage Section 29 of the Act because it involves the delivery of a SPEI.

2.46 Section 29 of the Act includes the following requirements:

(a) The subsidy is limited to what is necessary to deliver the SPEI services having regard to costs of delivery and reasonable profits;

(b) The subsidy is given in a transparent manner, meaning that the subsidy is given in accordance with a written (or other legally enforceable arrangement in writing), which sets out the terms of the subsidy and contains certain prescribed information; and

(c) Arrangements are in place to regularly review the subsidy to ensure it remains limited to the minimum amount necessary and that any excess funds can be recovered.

2.47 The Assessment states that the Subsidy will be limited to the amount necessary to deliver the services. It explains that the Subsidy is intended to cover the shortfall between the cost of providing the services less any income received from fares and from other commercial operations associated with the provisions of the CHFS. CalMac is not intended to make any profit. In the event a profit is made, it will be reinvested in the provision of the services to reduce the level of Subsidy required or otherwise returned to Transport Scotland.

2.48 As regards the transparency requirements, the Assessment explains that Transport Scotland will enter into a Grant Agreement and a Grant-in-Aid Letter which will be legally binding, alongside wider governance changes arising from the new Teckal arrangement. The Grant agreement will set out the service levels required of CalMac, KPI requirements, the terms on which payments will be made to CalMac to compensate it and will include all the information required by the Act.

2.49 The Assessment explains that the Grant Agreement and Grant-in-Aid Letter will ensure that CalMac is contractually bound to act economically, effectively and efficiently in providing the services. Within this framework, Transport Scotland will apply a budgeting process ensuring that CalMac will only receive payments necessary to compensate it for the annual revenue shortfall when performing the services and which will also ensure that CalMac will not be able to use the Subsidy to fund any activities other than the services for which the Subsidy is granted.

2.50 The Assessment explains that the Grant Agreement and Grant-in-Aid Letters will enable them to review the use of the Subsidy to ensure compliance with the requirements of the Act and for the recovery of the Subsidy through clawbacks if necessary.

2.51 In our view, in relation to the transparency requirements, the Assessment should better explain how Transport Scotland will ensure that the greater flexibility to adjust service level in the lifetime of the contract remains consistent with the transparency requirements of Section 29 of the Act. We also consider that the shortcomings identified in relation to proportionality might affect the assessment of whether the Subsidy limited to what is necessary to deliver the SPEI services.

2.52 Transport Scotland has confirmed that no other requirements or prohibitions set out in Chapter 2 of Part 2 of the Act applies to the Subsidy.

17 December 2024