



# **Public Consultation: Universal Design Guidelines for Electric Vehicle Charging Infrastructure.** (Zero Emissions Vehicles Ireland, Department for Transport, Irish Government)

Response by the Consumer Council Northern Ireland

26 September 2023

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## **1. EXECUTIVE SUMMARY**

The role of the Consumer Council is to promote and safeguard the interests of all consumers in Northern Ireland. We understand the importance for consumers to have an interoperable and consistent electric vehicle charging network across the Island of Ireland. Therefore, we welcome the opportunity to respond to this public consultation on Electric Vehicle Charging Infrastructure Universal Design Guidelines from Zero Emission Vehicles Ireland (ZEVl).

Our full response is provided in section 3, in summary:

- We support the approach taken by ZEVl to consider international best practice in developing Electric Vehicle Charging Infrastructure Universal Design Guidelines.
- Many consumers in Northern Ireland travel back and forth across the border with the Republic of Ireland frequently. The key issue therefore for Northern Ireland consumers is that the authorities in Republic of Ireland and in Northern Ireland work to ensure that their public charging facilities are interoperable for consumers in both jurisdictions.

## 2. ABOUT US

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

We are an insight-led, evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Article 5(1) of the Order requires the Consumer Council to: “consider and, where it appears to it to be desirable, make recommendations with respect to any matter affecting road or railway passenger transport services and facilities in Northern Ireland and services and facilities provided for passengers travelling to and from Northern Ireland.”

We undertake this function by working in partnership with the NI Government, Translink, Northern Ireland air and ferry port operators, airlines, ferry companies and other stakeholder organisations. We handle complaints against transport service operators and use these, along with research, to inform our recommendations.

### 3. RESPONSE TO CONSULTATION

There is a move in many countries to decarbonise transport. This is reflected in government policies and strategies where electrification of transport is often a central feature.

As part of developing the Electric Vehicle Charging Infrastructure Universal Design Guidelines, ZEVl reviewed international best practice considering electric vehicle infrastructure. This includes the UK Electric Vehicles Accessible Charging Specification - PAS 1899:2022. We welcome the consideration of PAS 1899 in developing Guidelines for the Republic of Ireland. The Consumer Council fully supports the PAS 1899, having responded to the consultation<sup>1</sup> and promoting it in our engagement with stakeholders. Having accessibility at the centre of electric vehicle infrastructure design and installation will avoid inconvenience for many consumers and the need for retrofitting.

The aim of the Electric Vehicle Charging Infrastructure Universal Design Guidelines is *“to make electric vehicle charging stations accessible to all users”*. This aligns with the PAS 1899 which in reference to UK Government policy and intervention states *“Alignment with these policies and strategies will mean that all charge points are inclusive and accessible and can be used by all consumers, designed to relevant standards”*.

Many consumers in Northern Ireland travel back and forth across the border with the Republic of Ireland frequently. As the electrification of transport accelerates, consumers travelling across the border will need to be provided with certainty, consistency and interoperability when travelling using an electric vehicle. Therefore, the Consumer Council believes that it is incumbent upon the authorities in Northern Ireland and the Republic of Ireland to work together to ensure that electric vehicle public charging facilities are interoperable and consistent across both jurisdictions. This will be to the benefit of consumers in both Northern Ireland and the Republic of Ireland.

The Consumer Council is a representative on the Northern Ireland Government, Department for Infrastructure, Electric Vehicle Infrastructure Task-Force. As such we established the Electric Vehicle Infrastructure Consumer Subgroup to inform the Task-Force on consumer specific issues. The Subgroup produced a paper - Consumer Priorities for Electric Vehicle Charging Infrastructure in Northern Ireland, in July 2022.<sup>2</sup> Within this paper we emphasised that public charge points in Northern Ireland and Republic of Ireland should be interoperable.

### 4. CONCLUSION

We support the approach taken by ZEVl in the consultation document on Universal Design Guidelines which provides an initial framework for expanding access to a more inclusive and accessible charging infrastructure. We advocate that authorities in Northern Ireland and the Republic of Ireland ensure that electric vehicle public charging facilities are interoperable and consistent across both jurisdictions given the frequency of travel across the border.

### 5. CONTACT DETAILS

If you require more information please contact Hannah Brown, Senior Policy Officer (Transport) at [Hannah.brown@consumercouncil.org.uk](mailto:Hannah.brown@consumercouncil.org.uk).

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<sup>1</sup> [Consultation response PAS 1899 Electric Vehicle Accessible charging specification.pdf \(consumercouncil.org.uk\)](#)

<sup>2</sup> [Consumer Priorities Electric Vehicle Charging July 2022.PDF \(consumercouncil.org.uk\)](#)



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