

CO₂ emissions regulatory framework for all newly sold road vehicles in the UK

RoSPA's response to Department for Transport's consultation

September 2021



Response to Department for Transport's consultation: CO₂ emissions regulatory framework for all newly sold road vehicles in the UK

Introduction

This is the response of The Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport's consultation on the CO₂ emissions regulatory framework for all newly sold vehicles in the UK. It has been produced following consultation with RoSPA's National Road Safety Committee. We have no objection to our response being reproduced or attributed.

The consultation seeks views on the proposed regulatory framework for the UK with regard to all newly sold road vehicles. The consultation proposes 'tightening' the existing efficiency-based regulations to more closely align with [petrol and diesel phase out commitments](#) or making a UK zero emission vehicle mandate as well as CO₂ regulations.



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Your details

Name:

Rebecca Needham.

Email address:

rneedham@rospa.com

Are you responding as an individual or on behalf of an organisation?

On behalf of an organisation.

You are responding as?

An accident prevention charity.



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Significant zero emission capability

What metric, or combination of metrics should be used to set eligibility for cars and vans between 2030 and 2035?

RoSPA response

RoSPA is not in a position to comment on further metrics, but would agree that it seems sensible to use grammes of CO₂ per kilometre (gCO₂/km), as this is the established metric for measuring emissions from vehicles.

For your chosen metric, what threshold should new cars and vans be required to meet from 2030?

RoSPA response

RoSPA is not in a position to comment.

What other requirements could be introduced, if any, to maximise zero emission capability?

RoSPA response

RoSPA has no further comment.

What would the impact be on different sectors of industry and society in setting an SZEC requirement, using evidence where possible?

RoSPA response

RoSPA is not in a position to comment.



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Possible future frameworks

Do you have any comments regarding Option 1, to replicate the current regulatory framework, albeit with strengthened targets, to meet our wider carbon reduction targets and phase out dates?

RoSPA response

RoSPA recognises that replicating the current regime as closely as possible, albeit with tougher targets, would provide a degree of continuity to manufacturers and the wider industry. It could also be implemented quickly. However, a radical approach will be required to meet ambitious decarbonisation targets.

As the paper states, as this framework would be based on fleet-wide average targets, it would allow manufacturers a period of flexibility in the short term as the fleet transitions to zero emission. It also guarantees that the fleet reduces its CO₂ emissions as a whole and that carbon reduction targets are met.

One concern with this approach is that although the Worldwide harmonised Light vehicle Test Procedure would be used to test emissions of new vehicles, this is not necessarily reflective of real world emissions. Vehicles could perform well in the test, but the CO₂ improvements may not follow as part of real world use. This approach may also encourage innovation in reducing the emissions of petrol and diesel vehicles at the expense of the development of zero emission vehicles.

Do you have any comments regarding Option 2, to introduce a ZEV Mandate or sales target alongside a CO₂ regulation?

RoSPA response

The clear benefit of this approach is that a zero emission vehicle mandate would guarantee a certain percentage of zero emission vehicles or significant zero emission capable vehicles being sold and an accompanying a CO₂ regulatory framework would ensure a reduction in emissions in line with the UK's commitments.

The trading element will also ensure that the technological shift is performed in the most cost-efficient manner. Manufacturers who can deploy zero emission vehicles 'cheaply' will do so, while those who find it more difficult will purchase credits, until it becomes financially beneficial to move to zero emission vehicles.

Setting out numbers of zero emissions vehicles to be sold in the UK each year will also encourage investment in the technology and in charging infrastructure.

As the paper states, the disadvantage is that manufacturers will be required to essentially meet two separate targets under the regime, which could add additional burden and cost to compliance strategies, as well as to the design of the regime itself. Establishing a secondary trading market for both zero emission vehicle Credits and CO₂ credits will also lead to additional administrative processes for manufacturer.



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Do you have any views on the government's initial preference for the regulatory approach set out in Option 2?

RoSPA response

RoSPA welcomes the government's preference for option two, as this will allow the government to fully legislate for the phase out of new petrol and diesel cars and vans in 2030, and to legislate for all new cars and vans being zero emission at the tailpipe by 2035. As the paper states, option two would ensure that the deployment of new zero emission vehicles could be guaranteed. A CO₂ target on its own does not guarantee that certain levels of zero emission vehicles would be sold in the UK.

Are there alternative approaches that could deliver on the government's carbon budget and 2030/2035 commitments?

RoSPA response

RoSPA is not in a position to comment.

Do you have any views on how either, or both, of the options could be implemented?

RoSPA response

RoSPA is not in a position to comment.

Do you have any further comments or evidence which could inform the development of the new framework?

RoSPA response

RoSPA has no further comment.



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Additional issues for consideration

Stringency of CO₂ Target

If deploying a combined ZEV Mandate and CO₂ regulatory framework, how should the CO₂ element be set?

RoSPA response

RoSPA's preference would be the second scenario set out in the paper, in that would see the CO₂ target set at a level that requires continued CO₂ reductions alongside increased deployment of zero emission vehicles. This would ensure that as the number of zero emission vehicles being sold increases, the overall CO₂ emissions from new vehicles that are not zero emission vehicles would also be required to fall - whether through efficiency improvements or changes to the vehicle types that are sold.

The first scenario, a ZEV mandate alone, would mean that CO₂ emitting vehicles would be largely unregulated.

Should the focus be on delivering the largest possible CO₂ savings, or the quickest possible switch to zero emission mobility?

RoSPA response

RoSPA believes that the focus should be on delivering the largest possible CO₂ savings, as a complete focus on zero emission mobility would lead to CO₂ vehicles being largely unregulated. Option two presented in the paper includes targets for the numbers of zero emission vehicles sold alongside a CO₂ mandate.

How do we ensure that the target allows for sufficient supply of low and zero emission vehicles; supports investment in the UK; and delivers our carbon reduction commitments?

RoSPA response

RoSPA believes that the second option would best meet these three conditions.

Derogations and exemptions



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Should the new regulatory framework include exemptions or modified targets for certain specialist vehicles and/or niche and small volume manufacturers?

RoSPA response

RoSPA believes that derogations and exemptions from any legislation benefitting safety or the environment must be kept to a minimum. That being said, we would support derogations and exemptions for a limited number of vehicles special purpose vehicles, such as military service and emergency vehicles, due to the challenges decarbonising some of these vehicles. RoSPA is hopeful that in time, even special purpose vehicles can be decarbonised.

Credit Levels

Should credits be awarded to vehicles that meet the SZEC definition?

RoSPA response

RoSPA believes that credits should be awarded to significant zero emission capability (SZEC) vehicles, as these vehicles will play an important role in the run up to 2035.

If so, should this be a fixed number of credits, or should there be a sliding scale that recognises the difference in CO₂ efficiency of various SZEC-compliant vehicles?

RoSPA response

RoSPA believe that a sliding scale would be more appropriate, different amounts of credits could be awarded depending on the characteristics of the vehicle registered and on the criteria that the vehicles are required to meet.

Credit banking and trading

Should this be considered within the new framework?



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RoSPA response

RoSPA believes that credit banking and trading should be considered as part of the new framework. Introducing a trading element would allow manufacturers that have not met their target through the sale of vehicles to 'buy' their way to the target, and would provide financial incentive to overachieve against targets.

If so, over what timeframe should they remain usable and should credits and debits be treated the same or differently?

RoSPA response

RoSPA is not in a position to comment.

Within the trading element of the new scheme, should there be limits on the number of certificates/grams of CO₂ that can be bought or sold?

RoSPA response

RoSPA believes that it would be sensible to place limits on the number of certificates/grams of CO₂ that can be brought, although we are not in a position to comment on what this limit should be.

Should such a market cover the whole of road transport or should there be some constraints imposed on trading across manufacturing sectors (e.g. cars and Heavy Duty Vehicles)?

RoSPA response

RoSPA is not in a position to comment.



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Levels of fines for non-compliance

How, and at what level, should fines be set in the new UK regulatory framework and should this vary for different vehicle types?

RoSPA response

RoSPA is not in a position to comment on how and what levels fines should be set. However, as is the case in the current regulatory regime, we would expect the fines to be higher for heavy duty vehicles than car and vans.

Target setting process

In the future UK regulatory regime, we have the opportunity to determine how far ahead we set the targets, the lead in time for any change in targets and whether the option to amend targets at shorter notice is required. We would welcome views on each of these.

RoSPA response

RoSPA is not in a position to comment.

Real-world emissions

Would there be benefits in seeking to ensure any CO₂ targets in the new UK regulatory framework take into account real-world emissions data alongside the lab-tested WLTP CO₂ emissions figures? If so, how might the two be linked?

RoSPA response

RoSPA would welcome this approach. The Worldwide harmonised Light vehicle Test Procedure, which is used to test emissions of new vehicles, is not necessarily reflective of real world emissions. Vehicles could perform well in the test, but the CO₂ improvements may not follow as part of real world use. Taking into account real world emissions data alongside this would be helpful. To link the two elements, a tolerance for differences between performance in the test and real world emissions could be set.



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Extending the Framework to All Road Vehicles

Heavy duty vehicles

For vehicle sub-categories that are not yet covered by VECTO, could a ZEV Mandate/sales target be extended before VECTO is adapted?

RoSPA response

RoSPA is not in a position to comment.

Would there be any unintended consequences of establishing a ZEV Mandate for certain vehicle sub-categories before a CO₂-based regulation?

RoSPA response

RoSPA is not in a position to comment.

Do you have any views on imposing a CO₂ regulation on vehicle types that are not yet covered by a CO₂ test procedure, or existing regulation, particularly in light of the planned future phase out consultation for new non-zero emission buses?

RoSPA response

RoSPA is not in a position to comment.



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L-Category vehicles (Motorbikes, Mopeds, Quad Bikes etc)

Should the preferred regulatory approach be extended to all L-category vehicles or should the diversity of the sector (motorbikes, mopeds, motorised tricycles, quadbikes, motorised quadricycles etc) necessitate different approaches?

RoSPA response

RoSPA believes that the preferred regulatory approach should be extended to all L-category vehicles.

Further comments

The main advantages of electric vehicles are that they emit zero emissions, are less likely to harm the environment and can be cheaper than petrol or diesel cars to run and maintain. However, despite their environmental benefits, electric vehicles bring a new set of road safety challenges. These include silent running at low speeds, which can be dangerous for nearby vulnerable road users, particularly where no noise-emitting device is installed. These vehicles can also accelerate very quickly and are very quiet when travelling at high speeds, which may reduce the sensation of speed for the driver, inadvertently leading to excessive speed. As drivers begin to make the switch to electric vehicles, they should be encouraged to go on specialist training courses and gain qualifications such as RoSPA's new Level 2 defensive driving for electric vehicles to improve their awareness and help them adapt their behaviour to remain safe in these new types of vehicles. As electric vehicles begin to be introduced in the workplace, we will need to encourage employers to invest in banksman training. It becomes even more important for pedestrians to be aware of moving vehicles, for drivers to be aware that pedestrians might not hear them approaching and for banksmen to support safe manoeuvring.

To achieve our ambitious carbon reduction targets, we will also need to encourage commuters to leave their cars at home and opt for different modes of transport. A reduction in the number of cars being used on our roads will reduce urban pollution and congestion. Instead, commuters will need to consider using low or zero emissions public transport, active travel modes, such as walking and cycling, or micromobility devices, such as electric scooters. RoSPA believes that electric bikes and scooters will have a big role to play in modal shift, as they will allow riders to reach their destination relatively quickly. RoSPA encourages those opting for micromobility modes to seek training, such as that offered by some e-scooter providers.

RoSPA has no further comments to make on the consultation process, other than to thank Department for Transport for the opportunity to comment. We have no objection to our response being reproduced or attributed.

