

Consultation on when to phase out the sale of new non-zero emission heavy goods vehicles

Introduction

Thank you for responding to our consultation on setting phase out dates for the sale of new non-zero emission HGVs.

The closing date for this consultation in 23:45 on is 3rd September 2021. Please send your completed response form to HGVconsultation@dft.gov.uk

Due to remote working, we strongly encourage responses by email. If you are unable to respond by email, we would invite you to please let us know by asking someone to email on your behalf.

If none of the above is possible, then we invite you to send written responses to:

HGV phase out date consultation
Great Minister House
33 Horseferry Road
London
SW1P 4DR

About this consultation

Background

Transport is the largest contributor to domestic UK greenhouse gas (GHG) emissions, accounting for 27% of emissions in 2019. Within transport, HGVs are second only to cars and vans in terms of total GHG emissions. The proposed phase out dates put forward in this consultation reflect what is needed for the UK's HGV fleet to deliver its contribution to net zero by 2050.

Consultation proposals

We are seeking views on the following proposed phase out dates for the sale of new non-zero emission HGVs:

- **2035** (or earlier if a faster transition seems feasible) for vehicles weighing from 3.5 tonnes up to and including 26 tonnes.
- **2040** (or earlier if a faster transition seems feasible) for vehicles weighing more than 26 tonnes.

We are also seeking views on:

- whether to extend these phase out dates to HGVs using low carbon fuels.
- whether the maximum permissible weights of zero emission or alternatively fuelled HGVs should increase to allow for their generally heavier powertrains. Weight limits would increase by the additional weight of the powertrain, up to a maximum of 1 tonne for alternatively fuelled HGVs and 2 tonnes for zero emissions HGVs.

Confidentiality and data protection

Department for Transport (DfT) is running this survey to assist with setting appropriate phase out dates for the sale of new, non-zero emission HGVs.

We are asking for:

- your name and email address, in case we need to ask you follow-up questions about your responses (you do not have to give us this personal information, but if you do provide it, we will use it only for the purpose of asking follow-up questions.)
- whether you are representing an organisation or yourself.
- if you are representing an organisation, the name of the organisation or business you represent and the type. Please note, sole traders are not required to provide this information.

Your consultation response and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. Any information you provide that allows individual people to be identified, including yourself, will be protected by data protection law and DfT will be the controller for this information.

[DfT's privacy policy \(open in new window\)](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the closing date.

Your details

Questions in this section provide us with important information on your relationship to the consultation, whether your interest is as a member of the public, an academic or as the representative of an organisation. Understanding this information allows us to understand how different sectors of society view our proposals.

1. Your and email address:

Name:	Cllr Doug McMurdo
Email:	Chair@lapfforum.org

2. Are you responding: *

	as an individual?
X	on behalf of an organisation?

Organisation details

3. Name of your organisation:

Please note sole traders are not required to provide this information.

Organisation name:	Local Authority Pension Fund Forum
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3. Are you responding as:

Please note sole traders are not required to provide this information.

	a representative of a business or firm?
	a representative for a trade body?
	a representative of an academic or research organisation?
	a representative of a local authority or other public body?
	from a community group?
	another organisation?
	Member organisation of Local Authority Pension Fund and pool members

Consultation Questions

Please note none of the questions in this consultation are compulsory.

- 1. Do you agree or disagree that introducing a phase out date for the sale of new non-zero emission HGVs will help us meet our legally binding net zero target?**

X	Agree
	No
	Don't know

Please explain your answer.

A phase out date provides regulatory certainty for companies which then allows boards to make timely decisions on technological and manufacturing investments to provide zero-carbon technology. This will provide a necessary foundation for the government to meet its legally binding target on emission reductions.

Our experience engaging with companies is that, without strong and timely regulation, achieving the UK's ambitions for reducing HGV emissions will be slower and less effective as some companies tend only to meet minimum regulatory requirements.

- 2. Do you agree or disagree with our approach to split the phase out dates for new non-zero emission HGVs into two weight categories?**

	Yes
X	No
	Don't know

Please explain your answer.

Recognising the challenges in applying zero emission technology to heavier HGVs, it is understandable why the government initially may considering an approach which splits the phase out dates for new non-zero emission HGVs into two weight categories.

However, this does seem an extremely 'siloed' approach, in that no reference is made in the consultation document to the prospect of rail substitution for freight that currently requires the use of heavier HGVs. Given that one single freight train takes about 76 HGVs off the roads (Rail freight - Network Rail) more emphasis could be placed on greater use of rail freight combined with lesser weight zero-emission delivery vehicles for the shorter deliveries to the final destination.

3. Do you agree or disagree that 26 tonnes and under, and more than 26 tonnes are the right categories?

	Yes
	No
	Don't know

What evidence do you have for or against?

4. Do you agree or disagree with our proposal to end the sale of new non-zero emission HGVs, for vehicles weighing from 3.5 up to and including 26 tonnes, by 2035?

	Agree
X	Disagree

	Don't know
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What evidence do you have for or against?

The latest Intergovernmental Panel on Climate Change (IPCC) report [Sixth Assessment Report \(ipcc.ch\)](https://www.ipcc.ch) has indicated that the carbon budget that gives an 83% chance of remaining within 1.5 degrees of warming, will be used up by 2027 at the current emissions rate.

The UK government's own climate change target is to reduce emissions by 78% by 2035 over 1990 levels.

In this context, and in line with LAPFF's response to the DfT 2020 consultation on ending the sale of new petrol, diesel and hybrid cars and vans, LAPFF considers the UK government should aim for 2025 for the phase out of all new non-zero emission HGVs.

By announcing the rule change now, this would give manufacturers enough time to adjust their plans and investment choices.

5. What do you consider the main challenges and barriers to meeting this target for HGVs 26 tonnes and under?

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6. How can these barriers be addressed?

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7. Do you agree or disagree with our proposal to end the sale of new non-zero emission HGVs, for vehicles weighing more than 26 tonnes, by 2040? What evidence do you have for or against?

	Agree
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X	Disagree
	Don't know

What evidence do you have for or against?

The UK government's own climate change target is to reduce emissions by 78% by 2035 over 1990 levels.

Given this, and the options of rail-freight supplemented by zero-emission delivery vehicles for the shorter distances to deliveries' final destinations, the government should adopt a target date in line with its own national target. This should thus be a phase-out date of 2025 for all HGVs. This would also be better aligned with the latest available data from the IPCC on overall carbon budgets.

8. What do you consider the main challenges and barriers to meeting this target for HGVs weighing more than 26 tonnes?

9. How can these barriers be addressed?

10. Do you agree or disagree that these phase out dates should be extended to all non-zero emission HGVs, including those using low carbon fuels, in their respective weight categories?

X	Agree
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	No
	Don't know

Please explain your answer.

Although low carbon fuels (LCFs) contribute a significant proportion of transport emissions savings under current carbon budgets, they still result in carbon emissions and offer limited air quality benefits.

Given the 's' curve of technology take up, already being demonstrated in the take-up of fleet electric cars in the UK¹, maintaining a focus on LCFs locks this continued technology into the system. This is ultimately a mis-use of resources that would be best spent on developing genuine zero-carbon HGVs.

As noted, LCF's include hydrogen. A respected industry commentator has noted that this technology for vehicles for 'regional trucks' lies on the 'uncompetitive' end of the scale compared to battery-powered vehicles² and that electrical solutions are cheaper and more efficient.

11. Do you agree or disagree that maximum permissible weights for certain zero emission vehicles (mainly HGVs) on both international and domestic journeys should increase by up to 2 tonnes (without exceeding 44 tonnes)?

x	Agree
	No
	Don't know

¹ <https://www.businesscar.co.uk/news/2021/jun-28-4-jul/fleet-ev-market-seeing-exponential-growth,-volkswagen-boss-reports>
² <https://www.rechargenews.com/energy-transition/liebreich-oil-sector-is-lobbying-for-inefficient-hydrogen-cars-because-it-wants-to-delay-electrification-/2-1-1033226>

Please explain your answer.

If the increase allows for fully zero-carbon electric heavy goods vehicles, yes the maximum permissible weights should be increased to allow for the weight of the battery.

12. Do you agree or disagree that weight limits should increase by up to a maximum of 1 tonne for certain alternatively fuelled HGVs on both international and domestic journeys (without exceeding 44 tonnes)?

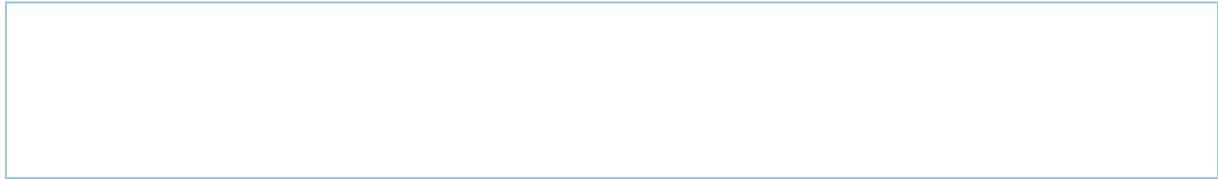
	Yes
	No
	Don't know

Please explain your answer.

13. Do you agree or disagree that weight limit increases should only offset any additional weight due to the alternatively fuelled or zero emissions technology?

	Yes
	No
	Don't know

Please explain your answer.



Final comments

Do you have any other comments?

LAPFF welcomes the government's consultation on setting phase out dates for the sale of new non-zero emission HGVs.

LAPFF's view is that the necessary rapid decarbonisation of the economy requires all partners to work together. This includes government setting the clear policy direction and regulatory standards. LAPFF therefore supports clearly identified legislative framework on carbon reductions, so that companies will be able to make the necessary decisions and financial commitments to provide the short and long-term solutions to decarbonising the economy that are needed.

Our experience engaging with companies is that, without strong and timely regulation, achieving the UK's ambitions for reducing HGV emissions will be slower and less effective as some companies tend only to meet minimum regulatory requirements.

Given the contribution that can be made by rail-freight and zero-emission delivery vehicles for final delivery destinations, LAPFF strongly supports a phase out date for the sale of new non-zero emission HGVs of 2025.