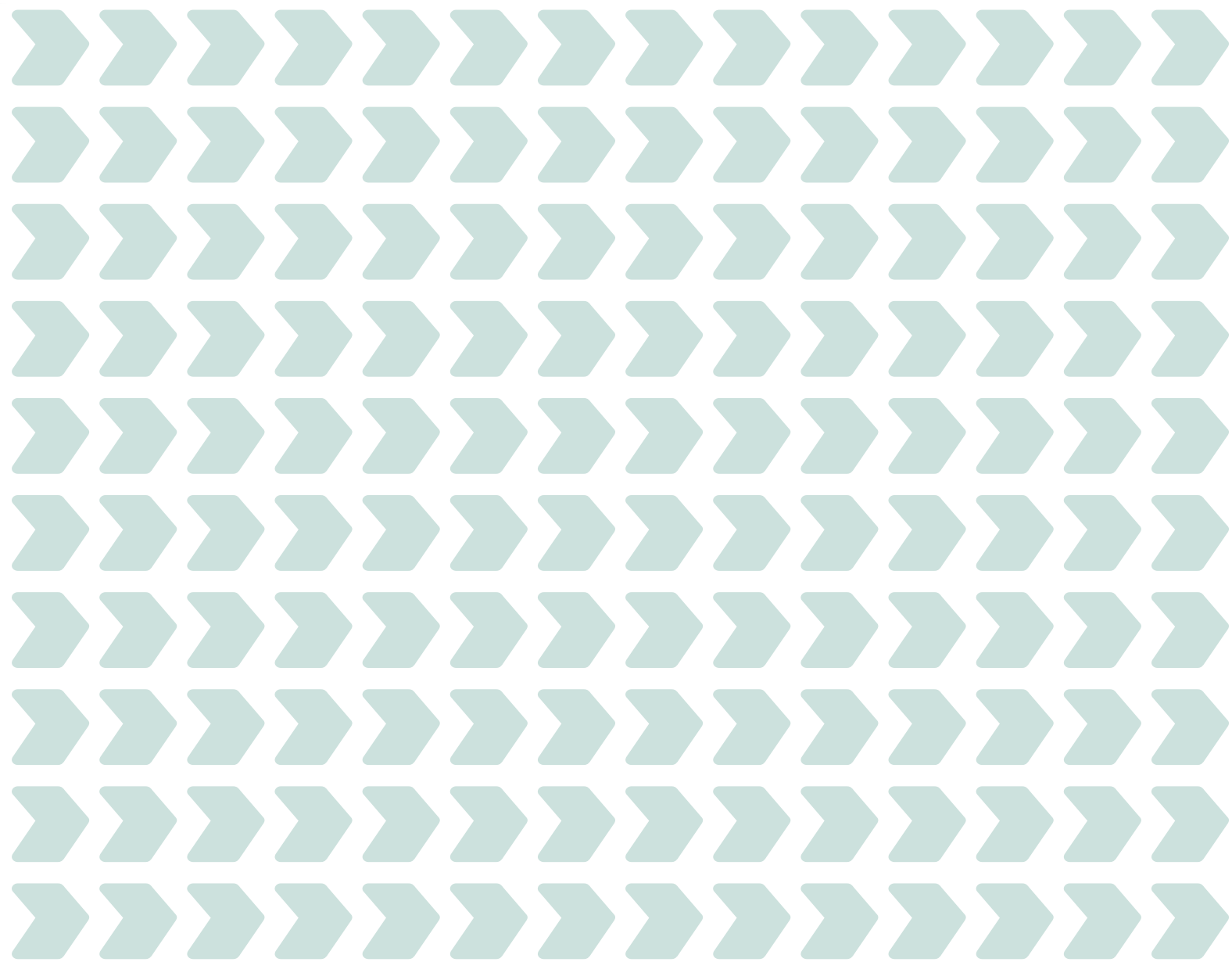




Department
for Transport

Introducing E10 Petrol: consultation

Annex D: Response form



1. Introduction and data protection

The consultation period begins on 4 March 2020 and will run until 23:45 on 19 April 2020. Please ensure that your response reaches us at the following email or postal address **on or before** the closing date.

Please send consultation responses by, ideally by email, to:

LowCarbonFuel.Consultation@dft.gov.uk

Name: Tim Simon
Address: Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR.

If you would like further copies of this consultation document you can contact Tim Simon - details above - who can also help if you need alternative formats (Braille, audio, CD):

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled. If you have any suggestions of others who may wish to be involved in this process please contact us or forward the document to them.

The responses to this consultation are likely to be discussed with representatives of the sector, as well as within the Department. Therefore the points you raise may be shared. If you are not content for this to happen please let us know. Subject to the outcome of the consultation the amendments to the legislation will be introduced as soon as practicable.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather views on E10 policy. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

[DfT's privacy policy](#) 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 consultation has been completed.

2. Responding

1. Your name and email address. We will only use this if we need to contact you to ask about any of your responses and to update you when we publish our response.

Name	Mark Fowler
Email	m.fowler@mcia.co.uk

2. Are you responding: *

<input type="checkbox"/>	On behalf of an organisation? Go to question 3
<input type="checkbox"/>	As an individual? Begin consultation response (section 2)

3. Organisation details: *

Company/Organisation Name	Motorcycle Industry Association (MCIA)
Address	1 Rye Hill Office Park, Birmingham Road, Allesley, Coventry
Postcode	CV5 9AB
Email	m.fowler@mcia.co.uk
Your Role / Position	Head of Technical & Regulatory Affairs
Please tick one box below that best describes your company or organisation.	
<input type="checkbox"/>	Micro business (0-9 employees)
<input type="checkbox"/>	Small business (10-49 employees)
<input type="checkbox"/>	Medium business (50-249 employees)
<input type="checkbox"/>	Large Company (250+ employees)
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Other (please describe):
If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members: 162	

3. Consultation questions

The questions below may not apply to all respondents. Please answer as many as are applicable to you or your business. In each case please set out the reasons for your answer and if applicable, alternative proposals.

Consultation proposals - Introducing E10 and keeping E5 available

Q 1 - Do you agree that the best way to introduce E10 petrol is as a direct replacement for the current 95 E5 premium grade? If not, please provide further information.	
Yes ✓	No
Additional information:	
Q 2 - Do you agree that introducing a minimum ethanol content of 5.5% in the 95 grade is the best way to ensure E10 is introduced across the UK? If not, what alternative would you propose?	
Yes ✓	No
Additional information:	

Q 3 - Do you agree that the minimum ethanol content requirements should apply to filling stations that sell more than one million litres of fuel per year and that this would only allow certain specialist retailers to continue to sell 95 E5? If not, please provide further information and alternative suggestions.

Yes ✓	No
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Additional information:

Q 4 - Do you agree that there should be an exemption for filling stations supplied from fuel terminals that are in turn supplied by ship? Is this definition suitable? Should other terminals be included or should a different or no exemption be applied?

Yes ✓	No
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Additional information:

Q 5 - Do you agree that introducing E10 in 2021 and providing industry and motorists with at least six months' notice and a two months' implementation period is sufficient to prepare for the change in fuel grades? If not, what alternative timelines would you suggest and why?

Yes ✓	No
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Additional information:

Q 6 - Do you agree that the protection grade should apply to the 97+ octane super petrol grade at filling stations that supply at least one million litres of fuel in the last calendar year and supply at least two grades of petrol? If not, please explain why and provide any alternative suggestions.

Yes ✓

No

Additional information:

Q 7 - Do you agree that the protection grade should apply for the maximum period of five years after the introduction of E10 before being reviewed for any further extension? If not, please explain why and provide any alternative suggestions.

Yes ✓

No

Additional information:

Q 8 - Do you agree that short term derogations are required to ensure fuel supply resilience can be maintained. If you do not agree, please set out the reasons why?

Yes ✓

No

Additional information:

Q 9 - What are likely scenarios in which a derogation may be required?

Response: As highlighted in the Consultation – loss of production/supply, or failure to achieve required quality for use, of the ethanol required for blending. Also, resilience in the face of National/Global emergencies or crises.

Q 10 - Are the duration, process and reporting elements of the derogations appropriate, and if not, what changes would you like to see and why?

Yes	No ✓
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Additional information: With regard to the cap of three derogations per 12-month period. Will there be the ability to increase the number of derogations should national or global crises create situations where an issue of a lack of suitable ethanol for blending occurs more than three times? We suggest inclusion of a process whereby the cap can be reviewed and exceeded should conditions out of the control of suppliers occur more frequently. This would obviously need to be tightly controlled with various set criteria needing to be met, which would be clearly highlighted within the process.

Q 11 - Is the classification of a fuel supplier appropriate for the application of derogations and if not, what would you suggest?

Yes ✓	No
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Additional information:

Q 12 - Do you agree with the proposed wording for the E10 labelling? If not, why not and what alternative would you suggest?

Yes ✓	No
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Additional information:

Q 13 - Do you have further comments or suggestions for communicating the E10 compatibility message?

Additional information:

We suggest that consideration should be made for the compatibility information for consumers at the point of sale to be implemented at the point of the laying of the legislation (point 3.38 of Consultation) and is not left to be included in the six-month notice period and two-month implementation period.

Those tied to E5 fuel should have the 8-month legislation to introduction period to be able to decide on how they will deal with the information on the compatibility of their vehicles with respect to the new E10 fuel. Whether it be to dispose of/replace vehicles, investigate modifications that may need to be carried out (and that aren't prohibitively expensive, or complex), or to fully understand which fuel they will be limited to once E10 has been introduced (minimum 97 octane, or super grade fuels) alongside locations that supply such fuels.

Call for Evidence - Implications of an E10 introduction for other policy mechanisms

Q 14 - Would an increase in RTFO targets, alongside or subsequent to an introduction of E10, deliver additional GHG savings from the scheme?	
Yes	No
Reasoning/ supporting evidence:	
Q 15 - Would you be supportive of such a change? You may wish to consider the level of any increase and the timing of it within your answers. Please provide any evidence you may have to support your response.	
Yes	No
Additional information:	
Q 16 - Do you expect any other risks or potential impacts of such a change other than the ones listed in this call for evidence?	

Yes	No
Additional information:	
<p>Q 17 - Please provide any evidence you have on the potential impacts of continuing the GHG saving obligation beyond 2020. We are interested in evidence relating to costs and GHG savings as well as wider impacts on the industry.</p> <p>If the targets were to continue, do you have any views on:</p> <ul style="list-style-type: none"> a. Which measures should be rewarded with GHG credits? For example, should UERs continue to be included? b. The level of the obligation, i.e. should it remain at 6%? c. Any other changes to the system you would like to propose. 	
Summary response:	
Point a -	
Point b -	
Point c -	
<p>Q 18 – Please use this space to add any additional comments, including questions raised in the Impact Assessment.</p>	

Additional comments: