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THE ROUTE TO TOMORROW'S JOURNEYS

Parliamentary Briefing February 2023



N ational M otorcyclists C ouncil











- The Motorcycle Industry Association (MCIA)

MCIA represents the L-Category sector which includes scooters, motorcycles and other 'L-Category' vehicles, often referred to as powered light vehicles (PLV's). MCIA represents all the major global manufacturers (e.g. Triumph, BMW, Honda, Harley-Davidson, Piaggio Group, KTM Group, Ducati, Royal Enfield, Yamaha, Kawasaki, Suzuki) and smaller manufacturer and importers covering over 95% of all new L-Category vehicles. MCIA also represents the wider business sector, including accessory and component manufacturers and companies that provide insurance, finance and other services.

- The National Motorcyclists Council (NMC)

The National Motorcyclists Council (NMC) is the UK coalition of motorcycling representative organisations, which work together to influence Government policy that affects motorcyclists. Collectively, its member organisations represent around 200,000 riders.



INTRODUCTION

This briefing outlines the key arguments in favour of the Government increasing its widespread promotion of L-Category vehicles in its transport policy and increased consumer uptake.

Its main focus is on the sector's biggest challenge to date - transitioning to zero emissions – and, in particular, the need for 'traditional' higher-powered motorcycles to be afforded more time in making the transition. It also highlights the need for technology neutrality - all technologies should be considered and supported with equal measure, including clean and synthetic fuels, not just battery electric.

MOTORCYCLES AND L-CATEGORY VEHICLES AND WHO RIDES THEM

We represent every L-Category vehicle, from L1 all the way up to L7. The below focuses on L1 and L3-Category vehicles to demonstrate the differences in use case, users and phase out capability.

	DESCRIPTION	USE CASE	USERS
L1 cdkw L2 Coode L3 cockw	 L1: 2, 3 or light 4-wheeled vehicles with top speed of 28mph (45km/h). Power up to 1,000 watts with power assist cut off at 15.5mph PTWs up to 50cc petrol engines or up to 4kW alternative power. Rider must wear helmet. 	First vehicle Commuting Last mile delivery	 Young people (16+) Delivery riders (all ages) Commuters (all ages)
	 L3: The most numerous L-Category, also referred to as PTWs and considered 'traditional' higher-powered motorcycles Subdivided into 3 groups, defined by power output. Riders are tested relative to vehicle power and their age and must wear a helmet. 	Commuting Courier Leisure	L3-A1: Delivery riders / Commuters (17 or over)L3-A2: Delivery riders / Commuters (19 or over)L3-A3: Delivery riders (21 or over vith 2 years A2 experience or 24 or over)

PHASE OUT CAPABILITY

Well suited to zero emission technology.Dom userOver 80% in the UK market are fully battery electric - continuing to evolve at pace.Travi in ru emissionPrimarily used for short distance commutes and last mile deliveries.Num chal silveUsed most frequently and so provide the most GHG emission savings.Req and and alterIndustry confident the 2030 date can be achieved without major disruption to the market and supply chain.Req market and alterPrimarily used for short distance commutes and chal silveReq market and alterIndustry confident the 2030 date can be achieved without major disruption to the market and supply chain.Req market and alterPharman market bise marketReq market bise marketIndustry confident the second date can be achieved without major disruption to the market and supply chain.Req market bise marketIndustry confident the second date can be achieved without major disruption to the market and supply chain.Req market bise marketIndustry confident the second date can be achieved without major disruption to the market bise marketReq market bise marketIndustry confident the second date can be achieved without major disruption to the market bise marketReq market bise marketIndustry confident the second date can be achieved without major disruption to the market bise marketReq market bise marketIndustry confident the second date can be bise marketReq market bise market <t< td=""><td>ominated by motorcycles and scooters mainly sed for leisure. avel less than 3000 miles per Annum, primarily rural settings which have limited impact on missions. umerous technical, architecture and safety hallenges when transitioning – electric not the lver bullet for L-Category vehicles. equire a bespoke approach (as with aviation hd HGVs) to allow battery technology and ternative fuel solutions to develop. egulatory divergence from other major markets ill make the UK a less attractive place to do usiness and risks major players reviewing their ace. urrent zero emission L3 PTWs have an stremely expensive price point due to supply hain development – not commercially viable for anufacturers to build or for consumer to buy. hasing out too early risks damaging anufacturers revenue from existing ICE kes, mean less revenue for designing and anufacturing zero emission products.</td></t<>	ominated by motorcycles and scooters mainly sed for leisure. avel less than 3000 miles per Annum, primarily rural settings which have limited impact on missions. umerous technical, architecture and safety hallenges when transitioning – electric not the lver bullet for L-Category vehicles. equire a bespoke approach (as with aviation hd HGVs) to allow battery technology and ternative fuel solutions to develop. egulatory divergence from other major markets ill make the UK a less attractive place to do usiness and risks major players reviewing their ace. urrent zero emission L3 PTWs have an stremely expensive price point due to supply hain development – not commercially viable for anufacturers to build or for consumer to buy. hasing out too early risks damaging anufacturers revenue from existing ICE kes, mean less revenue for designing and anufacturing zero emission products.

THE DECARBONISING CHALLENGE

In July 2021, the Government proposed to phase out all new non zero emission L-Category vehicles by 2035, subject to consultation. We engaged extensively with the consultation and officials, submitting our respective responses last September. The below summarises our key arguments and calls to action in helping the sector to make the transition while protecting key sectors.

WE FULLY SUPPORT THE NET ZERO AGENDA AND WANT TO DO ALL WE CAN TO HELP GOVERNMENT ACHIEVE A ZERO EMISSIONS UK TRANSPORT SYSTEM

However, this must not negatively impact the multi billion pound UK industry and user sector, and must recognise the diversity of L-Category vehicle usage and engine capacity - not just focusing on a mono-technology approach of zero emissions at the tailpipe. A one size fits all approach will not work.

GOVERNMENT PROPOSALS	
2030	2035
New non zero emission L1, L2, L3e-A1, L6 and L7 vehicles	All new non zero emission L-Category vehicles

A BESPOKE APPROACH TO PHASING OUT L-CATEGORY VEHICLES

- > Our sector emits less than 0.5% of the UK's total domestic transport emissions and so we do not believe we should be a priority target group for Government. Any action should be proportionate to our emissions, miles travelled and urban mobility benefits (e.g. reduced congestion and increased air quality).
- A more creative and bespoke approach is needed in addressing the complexities and technical challenges faced by the L-Category sector, plus take full account of the range of L-Category vehicle market demands, so as not to risk damaging the market but at the same time addressing CO₂ reduction.
- > Current proposals risk major players reviewing their place in the UK market until technology development is such that products can be more easily brought to the UK market.

THE L-CATEGORY SECTOR IS VASTLY DIFFERENT FROM THE AUTOMOTIVE SECTOR WHEN IT COMES TO PHASE OUT AND SO SHOULD NOT BE PAINTED WITH THE SAME BRUSH

- If manufacturers are forced to transition too soon, significant revenue will be lost from selling existing and near future internal combustion engine (ICE) motorcycles which will have a knock-on effect when it comes to developing and manufacturing zero emission products.
- The proposals don't adequately consider the complexities and nuances of the different vehicle categories, which means what's feasible for some segments (e.g. mopeds, or 'L1' vehicles) is not feasible for others (e.g. higher powered motorcycles that sit within the 'L3' vehicle category).
- > Our industry and users are being asked to make significant changes to the way in which our vehicles operate. However, before committing to any investments in new technology, it is critical we receive a guarantee from Government that, in doing so, the necessary infrastructure is in place and policies around driving demand and improving access to our sector have been implemented.
- > The Government must therefore conduct full scale readiness checks on these different areas, alongside industry and riders, two years in advance of each new phase out date:

CATEGORIES	L1 & L2 up to 4kW	L4, L6 & L7	L3 & L5 above 4kW
Readiness check date	2028	2035	From 2038
Phase out date	2030	2035	From 2040

OUR PROPOSAL IN DETAIL

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2030 L1 and L2 L-Category vehicles (up to 4kW)

- > Future technology is well suited to these categories and already helping to evolve the market at pace. These products are primarily used for short to medium distance commuting and last mile deliveries. Industry is confident the 2030 date can be achieved without major disruption to the market and supply chain.
- > Additionally, in terms of frequent, urban, and sub-urban use, these categories provide the most gains in terms of greenhouse gas (GHG) emission savings.



2035 L4, L6 and L7 L-Category vehicles

- L4, L6 and L7 vehicles are extremely diverse with multiple use cases. This includes urban (personal) mobility, leisure, light cargo, and last mile deliveries. It is clear this sector is quickly moving to electrification, but at the same time, a one size fits all approach will damage important sectors of the market if their phase out deadline remains 2030.
- > Volumes in these sectors are extremely low (currently less than 5% of the total market), with new entrants likely to be zero emission. However, what volumes do exist are made up of vehicle types that are used for sport and leisure. If the Government decides the deadline for these segments remains 2035 certain exemptions must be considered within this segment.



2040 All L3 and L5 L-Category vehicles

- The L3-Category is dominated by motorcycles and scooters that are often used for leisure purposes, travelling less than 3000 miles per annum and often in rural environments which have a limited impact on emissions.
- Combined with the technical challenges, we think it's fair the Government gives these categories more time, or to approach them in another way (as with aviation and HGVs), moving at a pace which recognises international developments in manufacturing and regulation. We propose "From 2040" which would allow battery technology and alternative fuel solutions to develop over the next 15 to 18 years before committing to an outcome that may significantly damage the economy and market.
- Regulatory divergence must also be avoided at all costs. We urge the Government to reconsider its position by allowing the necessary time for technologies to develop which, in-turn, would allow the sector to base its decision on facts and not what we hope might be the case.

OTHER FACTORS

- > Other Technologies Despite challenges around the development of carbon free fuels and hydrogen, this is an area of work which is moving at pace and is subject to significant investment and R&D as part of the move towards net zero. The potential is illustrated in the motorcycle sports sector which aims for all fuels in the MotoGP to be 100% non-fossil origin by 2027. This area is also important for the future of the UK's £18 billion historic vehicle sector.
- Infrastructure There is strong concern that EV charging station roll out will not keep pace with growing demand for both cars and L-Category vehicles. All such chargepoints should mandate a requirement to have charge station technology which is compatible with the L-Categories.
- Licensing The current criteria for Minimum Test Vehicles (MTV) required for the motorcycle test, as they apply to electric PTW's needs revision to make it possible to take the test for a full A licence on an electric PTW. Other key areas of licensing regulation also need adjustment as part of the <u>Action Plan</u>.



KEY FACTS





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