Motorcycle Industry Association (MCIA) submission
Environment and Climate Change Committee, Electric Vehicles Consultation, October 2023

About MCIA

1. MCIA is the trade association for 'L-Category' vehicles (also known as powered light vehicles (PLVs) which include powered two, three, and light four-wheeled vehicles (i.e., moped, motorcycles, tricycles, and quadricycles). Members include manufacturers of whole vehicles, accessory and components and those providing associated services to the industry.

2. With a mission to promote and protect the industry, MCIA works tirelessly to advance the growth, safety, and sustainability of L-Category vehicles. MCIA plays a vital role in shaping policies and regulations that impact the industry, working closely with government bodies and other relevant stakeholders to ensure the potential of our vehicles is fully harnessed.

3. MCIA also actively promotes motorcycle safety, aiming to enhance awareness and education among users and the general public. Through campaigns, initiatives, and partnerships, MCIA strives to reduce accidents, improve rider skills, and advocate for the implementation of effective safety measures.

What are the main obstacles to the achievement of the Government's 2030 and 2035 phase-out dates? Are the phase-out dates realistic and achievable? If not, what steps should the Government take to make the phase-out dates achievable?

4. MCIA and its members are committed to tackling climate change challenges and accept that CO2 reduction is a key part of this. Emitting less than 0.5% of the UK's total domestic transport emissions, we do not believe we should be a priority target group for Government. Furthermore, even some vehicles in our sector still using fossil fuels produce lower emissions than fully electric cars and vans. Our life cycle analysis demonstrated this and, more broadly, the need to look beyond exclusively zero emissions at the tailpipe and consider the whole life cycle of a vehicle in getting to carbon neutrality.

5. We do, however, appreciate there cannot be one rule for one transport mode, and another rule for others in the collective effort to reducing emissions at the tailpipe, and so call on Government to be more creative in its approach to addressing the complexities and technical challenges faced by the L-Category sector.

6. MCIA rejects the phase out dates for the L-Category sector as being unrealistic and there would be a significant risk to major players reviewing their place in the UK market. This may result in a reduction in UK operations or their leaving the market altogether until technology development is such that products can be more easily brought to the UK market.

7. The proposals fail to adequately consider the complexities and nuances of the different vehicle categories, which means what is feasible for some segments (e.g. mopeds, or 'L1' vehicles) is not feasible for others (e.g. higher powered motorcycles, or 'L3' vehicles). As already recognised by the then Minister, a 'one size fits all' approach will not work for this sector.

8. MCIA responded to the consultation on when to end the sale of new non zero emission L-Category vehicles in September 2022. Its full response can be read here.

The key obstacles preventing the L-Category sector from achieving the proposed dates are summarised below:

9. **Complexity of transition:** Unlike cars, L-Category vehicles are complex and present unique challenges in transitioning to net zero emissions. The technical, architectural, and safety challenges

we face are comparable to those of aviation and heavy goods vehicles. This has led to large capacity electric powered two wheelers (PTWs) having an extremely expensive price position due to supply chain development favouring automotive, rendering them commercially unviable for manufacturers to build or for consumers to buy. Our industry's diverse range of vehicles requires a bespoke approach, based on type of use and not simply vehicle category.

10. **Technology neutrality:** We believe in supporting all viable technologies equally. While electric solutions have proven effective for small capacity L-Category vehicles, the same cannot be said for larger capacity variants and so should not be considered the only solution. We recommend a genuinely technology neutral approach that considers low carbon and fully synthetic fuels alongside battery technology. This approach allows time for alternative technologies to develop before committing to an outcome that could have adverse economic and market impacts.

11. **International alignment:** We stress the importance of aligning phase out dates with international manufacturing and regulatory developments. Separate regulations could undermine the UK market's attractiveness. Any misalignment could lead to manufacturers leaving the market. Ensuring consistency will foster a conducive environment for investment at a time when it is needed most.

12. MCIA proposed the below alternative phase out dates for the L-Category sector which stem from a deep understanding of our industry's intricate dynamics, challenges, and impressive economic contribution:

2030	2035	From 2040
L1 and L2 Category vehicles up to 4kW	L4, L6 and L7 L-Category	L3 and L5 Category vehicles above 4kW

What can the Government do to make phase out achievable?

13. MCIA does not consider the Government's proposed dates achievable. However, underlying MCIA's alternative timeline for phasing out new non zero emission L-Category vehicles is a requirement that Government is as ready as it can be in advance of the phase out dates coming into force.

14. Our industry is rightly 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 our manufacturer members receive a guarantee from Government that, in doing so, the necessary infrastructure is in place.

15. Further, the industry requires government support in the form of clear policies driving demand and enhancing access to the sector. As per the Action Plan: Realising the Full Potential of Zero Emission Powered Light Vehicles, which MCIA developed with the Government's full support, it is imperative that industry is given the time for technologies to develop which would allow the sector to base its decision on facts and not what the Government hopes might be the case.

16. MCIA is therefore also calling on the Government to conduct full scale readiness checks on these different areas, alongside MCIA and its members, two years in advance of each new phase out date to ensure the necessary policies and regulations are in place to avoid undue harm to L-Category manufacturers.

What is the future role of L-segment and personal light electric vehicles, and how will that impact car ownership and usage? What is inhibiting their uptake?

17. L-Category vehicles offer a more environmentally friendly alternative to single occupancy cars and lightly laden vans, serving as cleaner, greener, and more affordable forms of personal mobility, getting people to and from work and/or college in urban, sub-urban and rural areas. Their role in

last mile delivery and other business opportunities mean they are also conducive to fostering a thriving and innovative transport environment that contributes to the economy.

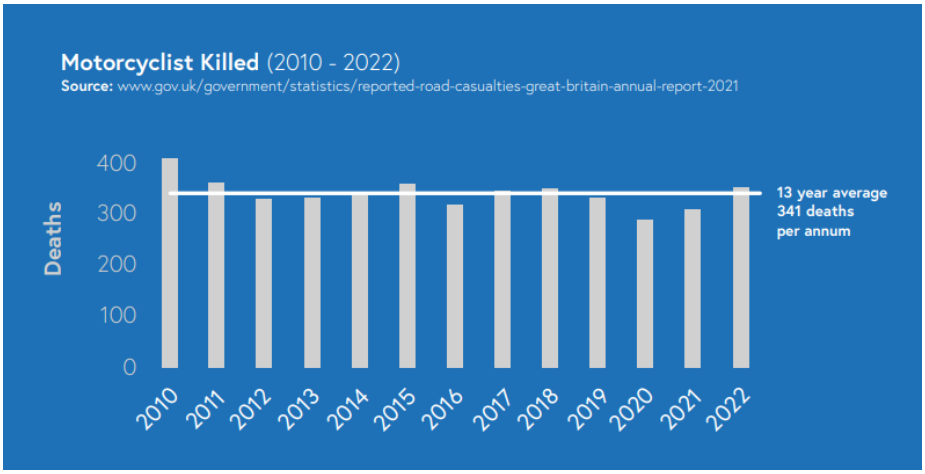
18. The Government's 2021 Transport Decarbonisation Plan recognised the pivotal role L-Category vehicles must play in our future transport systems. Regarding L-Category vehicles it says "they are smaller and lighter than many other vehicle types and so can have a significant impact on urban transport systems, particularly when used in place of other forms of low occupancy vehicles. Their size also makes them complementary to increased public transport use and the growth of cycling and walking infrastructure". It goes on to support L-Category vehicles as they "are a clean and efficient way of getting around and can reduce congestion, air, and noise pollution from transport."

19. The Transport Decarbonisation Plan tasked MCIA to produce a Joint Action Plan for the PLV sector in cooperation with Zemo Partnership. MCIA published its landmark Action Plan: Realising the Full Potential of Zero Emission Powered Light Vehicles in February 2022, underscoring our commitment to a greener future. The Action Plan identifies the barriers the sector must overcome and the opportunities it must harness, together with the Government, if its full potential is to be realised and, in turn, accessed by the broadest possible section of society.

The factors inhibiting uptake of L-Category vehicles included within the action plan are summarised below:

20. **Complicated process for attaining a license**: The current licensing process for L-Category vehicles is overly complex, repetitive and costly. Simplifying the licensing process would significantly lower barriers to entry, remove duplication and reduce costs. The current licensing process has prevented new users from entering our sector for years representing a key factor inhibiting uptake and adoption of L-Category vehicles.

21. Further, the current licensing process has failed to reduce casualties, as demonstrated on the table below. MCIA's proposals encourage upskilling and training of riders demonstrate safety can be enhanced through simplification.



22. MCIA launched its A Licence to Net Zero licensing campaign on 17th October with the support of Zemo Partnership and the National Motorcyclists Council. The campaign aims to make acquiring a moped, motorcycle or other powered light vehicle (PLV) licence simpler, fairer, safer and more accessible for all, enabling a greener future.

23. **Review of existing L-Category vehicle regulation:** The current L-Category vehicle regulatory framework needs to be modernised to ensure it remains fit for purpose and caters for the evolution of future zero emission PLVs. The current regulatory framework is advantageous to new, less regulated developments in light mobility including e-bikes and e-step scooters. A Licence to Net Zero includes proposals for the creation of two new vehicle categories, firstly bringing e-step scooters into L-Category regulation and introducing the electric light moped.

24. These proposals will prevent the industry from being undermined by less safe, less regulated developments in light mobility. The new e-step scooter and electric light moped vehicle types would require riders to have training, a licence, insurance and protective equipment.

25. **Drive demand:** Unlike the automotive sector, the L-Category does not benefit from the same suite of incentives that help to stimulate take up of zero emission vehicles. In 2021 the Government slashed the already inadequate plug-in motorcycle grant by 90%.

26. The Action Plan calls for a review of the grant and incentivisation structure in the L-Category sector which reflects the Government's ambitious vision for the sector and adopts learning from other vehicle categories where the roll out of zero emission tailpipe vehicles has been successful. It further calls for a public awareness campaign jointly led by Government and industry to promote the existence, availability and benefits of zero emission L-Category vehicles to consumers and businesses.

27. **Incorporating PLVs in infrastructure and communities:** L-Category vehicles are often not considered as integral to local transport and infrastructure planning. It is wrong to assume existing infrastructure is appropriate for all L-Category vehicles. Whereas L1-Category vehicles benefit from having removable batteries that can be charged using a standard 3-pin plug, for larger capacity bikes, the infrastructure is not always applicable in the same way it is for cars. Since journeys on large capacity L3-Category vehicles are often used for riding long distances, we remain extremely concerned the insufficiencies of current infrastructure in catering for this use case will mean consumers holding off on switching to electric bikes.

MCIA, October 2023