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Phasing out the sale of new petrol and diesel cars from 2030 and Support for the Zero Emission Transition Consultation Response Form

The full consultation document is available at:

<https://www.gov.uk/government/consultations/phasing-out-sales-of-new-petrol-and-diesel-cars-from-2030-and-supporting-the-zev-transition>

Please send written consultation responses to:

Department for Transport, ZEV Regulations, 3rd Floor Great Minster House, 33 Horseferry Road, London, SW1P 4DR

Or via email to: zevmandate@dft.gov.uk

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.

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

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This consultation is seeking your views on phasing out the sale of new petrol and diesel cars from 2030 and support for the zero-emission transition.

Your personal data collected through this consultation is processed in line with our online forms, surveys and consultations privacy notice.



Part 1: 2030 phase out of new ICE cars, and CO₂ requirements for vans

Question 1: Do you agree with the Government's view that full hybrid and plug-in hybrid technologies only should be considered? Please explain your answer.

Answer. No. Only plug-in hybrids should be considered, not full hybrids.

agree that mild hybrids should not be considered as they rely solely on internal combustion engines for all their motive power, and only give a small decrease in emissions. Full hybrids should not be considered for the same reasons.

Hybrids were a useful technological advance 25 years ago, but are outdated today. They only offer relatively small emissions reductions compared to ICE cars, nowhere near enough to get to net zero, hit the target of 81% carbon reductions by 2035, or be compatible with the 6th carbon budget. They can only go very short distances at slow speeds without using the engine, and as they cannot plug in, each mile is ultimately powered by fossil fuels. They are not electric cars and should not be considered different enough from ICE cars to be sold after the 2030 phase out. This also has the benefit of clarity and simplicity for both public and industry.

By 2030 falling battery costs and the ZEV mandate will have put electric cars at or below price parity with ICE cars for all or almost all of the market.

Question 2: Do you prefer a technological definition that permits both HEVs and PHEVs, or a technological definition that permits PHEVs only? Please explain your answer.

Answer. PHEVs only. Hybrids were a useful technological advance 25 years ago, but are outdated today. They only offer relatively small emissions reductions compared to ICE cars. They can only go very short distances at slow speeds without using the engine, and as they cannot plug in, each mile is powered by fossil fuels. They are not electric cars and should not be considered different enough from ICE cars to be sold from 2030.

PHEVs are capable of driving without tailpipe emissions and can play a transition role in our journey to net zero emissions transport. While there is a risk that drivers don't charge them and just use them as inefficiently heavy hybrids, as the electric range of PHEVs continues to grow and as the charger network continues to expand, we can expect PHEV drivers to increase their percentage of electric miles. New



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PHEVs capable of doing triple an average day's mileage without using the engine should be permitted up to 2035.

A technological definition that all new vehicles will have a plug has the benefit of clarity and simplicity for both public and industry.

Question 3: Do you support no further CO₂ requirements, a vehicle level CO₂ cap, or a fleetwide CO₂ requirement? Please explain your answer.

Answer. No further requirements.

It would be much simpler and clearer to have a rule that only plug-in cars will be available from 2030, and only full electric cars from 2035, than to have a CO₂ requirement allowing a mix of cars.

Keeping the transition to electric driving simple and clear to everyone will be very valuable for public understanding and confidence in it and support for it.

Keeping the transition to electric driving simple and clear – and not tinkering with it – will also be very valuable for industry, unions and investors who want certainty so they can plan. This is particularly true for companies building the charging network, and their investors, whose role in enabling the mass switch to electric driving is crucial, besides the economic boost they bring.

A simple technology based target will also strengthen the UK's climate diplomacy, sending a much clearer signal internationally that the UK intends to catch up with China, Norway, Sweden and other leading countries in electrifying surface transport.

The CO₂ estimates for PHEVs are subject to a number of assumptions which will change as the transition occurs, the range of new PHEVs increases, the charger network grows, and drivers' habits change, and we learn more about how the 3rd and 4th owners of PHEVs use them as the existing PHEV fleet ages. This makes CO₂ requirements less reliable, even with the planned updates, as the assumptions on which they're based change. Ensuring PHEVs have a long enough electric range to meet most drivers' needs for most journeys will be simpler and more reliable than a CO₂ requirement in changing conditions.



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Question 4: Should a minimum range be required for new PHEVs and, if so, at what level should it be set? Please explain your answer.

Answer. Yes, 70 miles.

PHEVs are a temporary transition to full electric driving. They have a bridge role for drivers without off-road parking who cannot charge at home and lack an adequate charging network locally, or who drive to areas which do not yet have an adequate charging network – likely to be more remote areas – or who are reluctant to move to a full EV.

PHEVs sold in the early 2030s will mostly still be on the road in the late 2040s, burning some petrol and making it hard for the UK to reach net zero overall by 2050, and continuing to emit during that time. So for PHEVs to be a constructive part of the transition to electric transport, they need enough range for most of their journeys to be electric. A 70-mile WLTP range probably means a 55 or 60 mile range for most journeys in practice, close to triple the average UK daily mileage of just under 20. Many new PHEVs on the market at the start of 2025 have WLTP ranges in the 70s and 80s, so setting a 70-mile minimum for 2030 is achievable and is low enough to cover the whole market, not just the expensive end.

We can expect some buyers of new PHEVs after 2030 to be attracted by wanting to use the engine without plugging in, but this number to fall steadily as the charging network grows and people become used to electric cars being the norm, and experience the savings from using electricity instead of petrol. We can also expect PHEVs to become more expensive than BEVs as the cost of making batteries continues to fall. Continuing to allow the sale of PHEVs from 2030-35 will create more emissions than only having full electric cars, but a 70-mile minimum electric range will limit the damage and it will be worth it to include all drivers of new cars while the charging network grows and develops, to strengthen public support for the ZEV mandate, and to reduce the number of people who keep driving ICE cars for longer into the 2030s and 40s.

Question 5: Do you agree with the Government's intention not to establish a technological definition for the specification of new non-ZE vans that may be sold from 2030? Please explain your answer.

Answer. Yes. The market for vans is mostly diesel and full electric, with a negligible amount of other powertrains and little prospect of this changing over the next 10 years, so there is no need for specifications for other technologies.



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Question 6: What are your views on establishing a CO₂ requirement for vans from 2030? What is your preferred measure, if any, and at what level should the target be set? Please explain your answer.

Answer. A CO₂ requirement would not be useful. The current ZEV mandate is working, with the industry slightly exceeding the 2024 target, so progressively increasing the mandate, backed up with expanding the charging network and some demand side measures, is likely to be enough.

Question 7: What would be the impact to the economy and to UK society of any new or additional non-ZEV CO₂ requirements in the van sector from 2030? Please explain your answer and provide evidence where possible.

Answer. Additional non-ZEV CO₂ requirements are unlikely to be needed.

Question 8: What are your views on current measures to support demand for zero emission vehicles? What additional measures could further support the transition?

Answer.

Current measures

Of the current support measures, keeping the ZEV mandate unchanged and not tinkering with it is the most important. Legacy car companies make bigger profits from selling ICE vehicles than EVs (because engines are still cheaper to make than batteries, although that is changing rapidly, and because they get to sell replacement parts for ICE cars during their working life which EVs do not need) and are not in a hurry to transition, so have so far tended to charge a premium price for EVs. The ZEV mandate pushes carmakers to sell EVs at the same prices as ICE cars, and is the most effective way to lower EV prices.

Expanding the charging network is now the second most important, particularly in residential areas for people without off-street parking – about a third of households – plus charging places for large vans. Government funding and private investment are both essential for this. So is maintaining the ZEV mandate as it is to give certainty to the charging industry and their investors.



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Help with the cost of buying electric vans is the third most important. The electric van market is less advanced than the electric car market and grants to reduce the up-front cost are still essential.

Help with the cost of buying electric cars was the most important and is still very useful, but is mattering proportionately less as the costs of making batteries are falling closer to parity with the costs of making car engines, and the ZEV mandate together with increasing competition push car companies to reduce EV prices.

Maintaining the ZEV mandate

Keeping the ZEV mandate is the most effective way to cut EV prices and is the best way the government can boost demand for EVs.

EV prices are higher than for ICE cars partly because the costs of producing EV batteries are higher than producing engines, though these are getting closer to parity in the UK and have reached parity in China for many sizes of car; battery costs [fell 20%](#) 2023-24. But a greater factor is that most legacy car companies add a premium to their EV prices much greater than the additional cost of manufacturing the battery, because they prefer selling ICE cars in which they have already sunk factory and development costs and which offer the chance of selling many more parts over the car's lifetime than an EV does.

The ZEV mandate is working well. It was negotiated carefully with the industry and the design includes major benefits from selling EVs and minor ones from selling PHEVs, hybrids and ICE cars with smaller, lower emitting engines. This wriggle room combined with raising EV sales to almost 20% of the market means that the industry as a whole met the 22% target for 2024, the first year of the mandate. Laggard companies will have to buy credit from leaders, but no company is expected to pay fines. Companies have had plenty of time to prepare for these targets and had a strong voice in setting them, and the industry as a whole should hit the 28% 2025 target when the wriggle room of hybrids and lower emitting ICE engines are included. Sales in [January 2025](#) are promising, with over 21% EV sales, the highest January on record. The wriggle room reduces over time, which is a good provision.

Experience with the previous round of targets for the EU is that legacy car companies mostly want to go as slowly as possible, because they make more profit from ICE cars than EVs, so price their EVs at a large premium above their ICE cars until the mixture of competition from new EV specialist companies and regulation pushes them to go faster. It is reasonable to expect the jump in EU emissions standards in 2025 will mean a jump in EV sales, achieved by cuts in prices and increases in models and choice, as happened last time the EU raised the standard in 2021. This is indeed the pattern in the first weeks of 2025. The EU's experience of



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similar regulation driving down EV prices bodes well for the effectiveness of the UK's ZEV mandate.

Charging network

Expanding on-street charging in residential areas without off-street parking is vital. If the government did only one thing to boost demand apart from keeping the ZEV mandate, it should be this, as lack of off-street parking is probably already the biggest barrier to EV uptake and is also the one markets are doing least to address. It may be worth prioritising Northern Ireland with its shorter journey distances.

Other essential actions include:

Expanding the charging network with fast chargers along motorways and main A-roads. This is accelerating and needs to keep pace with the growth in EVs.

Expanding the charging network with large spaces suitable for charging larger vans and minibuses.

Streamlining the planning process for installing commercial chargers, to make the process in the rest of the UK as fast as Scotland; and for installing domestic chargers in shared car parks for flats.

Reducing the spiralling costs of standing charges for commercial charge points.

Expanding the charging network with charge points accessible for wheelchair users and their vehicles. A separate consultation with disability groups about EVs and charging for users with disabilities would be worth considering.

Removing VAT on EV chargers, for both the equipment and installation. This would lower prices for households and increase demand, besides helping reduce inflation.

Streamlining the EV home charger grant. This scheme pays £350 towards installing an EV charger at home, but several installers, particularly smaller companies, are reluctant to use it as payments are slow and depend on the customer completing the form correctly. It would be helpful to simplify the process and increase the amount.

Clarifying the law to enable people to put charging cables across pavements, with safety mats.

Keeping the EV workplace charger grant. This is useful.



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Revising the building regulations to strengthen EV charger requirements. All new residential parking places should have a charger, whether on the road, in driveways, or in communal parking spaces, including some big enough for larger vans. They should be suitable for vehicle to grid charging. All new workplaces with car parks should have EV chargers for at least 75% of the spaces. Low power chargers will suffice.

Including funding for installing and maintaining chargers in the budgets of government bodies, through the public sector decarbonisation fund.

Fuel costs

Cutting VAT on public charging. Charging at home has 5% VAT, but charging at public chargers has 20% VAT. This isn't fair and reduces the savings of electric driving, particularly for people in homes without off-road parking, who are likely to have lower incomes. Equalising VAT on both at 5% would be very good value.

Unfreezing fuel duty. Petrol and diesel duty has been frozen for many years, costing taxpayers and subsidising ICE driving. Starting to raise duty again would increase the savings from electric driving, and raise additional funds to accelerate the transition.

Financial incentives

Keeping company car tax and salary sacrifice policies that favour EVs. These incentives are working well, persuading company car drivers to choose EVs instead of ICE cars, particularly at the bigger and more polluting end of the market, and providing a supply of second hand EVs after 2 or 3 years. Salary sacrifice for both new and used EVs is also valuable and worth keeping.

Keeping the plug-in van grant, including for wheelchair accessible vehicles and minibuses. The electric van market has much further to go than the car market, and increasing the grant for vans would be good value.

Providing grants for money off buying or leasing a new electric car. This has an impact but is less good value. The government should plan out a grant scheme for new electric cars under a mid-range price, and a scrappage scheme to trade in old ICE cars for second hand electric cars, ready to introduce if the economy needs extra stimulation, but in normal times other measures will be more useful and better value for money.

Reducing VAT on EVs. As with grants, this would be worth considering for a limited period if the market needs a temporary stimulus, perhaps halving VAT on cars under



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£30,000, but the cheaper the car the lower the saving would be, and other measures would be better value.

Providing interest free loans for EV buyers. The government could consider this for both new and second hand EVs, but it would be a more complex way to bring costs down, and the issue is price, not shortage of credit, so this is best kept as a plan on the shelf ready in case an economic stimulus is needed.

Providing subsidised electric car leases for new EVs. A government scheme leasing cheap new EVs to lower paid key workers who drive for work, such as midwives, care workers, and social workers, would be a good targeted way to help them get an EV. This worked well when France did it.

Funding local authorities to buy or lease electric specialist vehicles such as bin lorries, and to fit vehicle depots with chargers and, where necessary, grid upgrades. This would be good value and is essential for cash-strapped local authorities to make this investment.

Funding local authorities and bus companies to buy or lease electric buses, and to fit bus garages with chargers and, where necessary, grid upgrades. This is essential and good progress is being made where it is happening.

Introducing electric conversion grants to cover part of the cost of replacing engines in existing vehicles with electric motors and batteries. This has lower emissions than making a new vehicle and takes the engine off the road, but is only a very small scale industry in the UK at the moment. It would be worth piloting a grant scheme for converting commercial and specialist vehicles with long working lives remaining.

Other surface transport sectors

Planning to phase out ICE HGVs. This is a major priority, as this sector has significant emissions, similar to vans. The government was due to publish a plan in 2024 but this has been delayed and is needed soon.

Phasing out ICE motorbikes, scooters and two-wheelers. At around 100,000 new sales a year, this is a much smaller market than cars and vans, and mostly much smaller engines with lower emissions, but it still needs doing as the next stage in decarbonising transport. The Government should follow the same pattern as for vans with an ICE phase out date with interim emissions targets for manufacturers, and should consult industry, unions and consumers in 2025 on how to do it.

Phasing out ICE tractors and agricultural vehicles. The government should follow the same pattern as for cars with an ICE phase out date with interim emissions targets



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for manufacturers, consulting with farmers and industry, and should consider electric vehicle grants for small farms. The government should publish a green paper consulting on approaches and timings for decarbonising this sector.

Phasing out ICE inland shipping. Most uses for rivercraft, ferries, and barges would be suitable for electric power, either with new vessels or replacing engines in existing vessels, but few are yet in this country. The Government should publish a green paper consulting on approaches and timings for decarbonising this part of surface transport.

Tariffs

Cutting tariffs on imported EVs. Few of our imported EVs face tariffs, but ending the 10% import tariff on EVs made in China, while keeping it on ICE cars made in China, would reduce prices for new buyers, though at the cost of reducing government income and lowering protection for EVs made in the UK and elsewhere. Keeping this option and announcing a temporary tariff holiday if EV sales need a time-limited boost at any point would be worthwhile.

Government tendering

Using tenders to boost EVs. Specifying in government tendering processes for major contracts that only electric vehicles can be used would help hit decarbonisation and ZEV targets, after consulting with the construction and contracting industry and unions about the date to bring this in and the detailed conditions.

Just transition

Creating a just transition fund. The transition to electric vehicles will create new jobs and end old jobs, but the two will not always match at the same times and in the same places, or for the same people. The government should consult with industry and unions and create a just transition fund for workers in the ICE vehicle industry, to pay their old salaries for 18 months or for another suitable limited time and pay for retraining for good jobs in the industries of the future, without affecting redundancy entitlements. This will be needed for some people working in parts of UK vehicle manufacturing, particularly as a key part of the UK auto industry makes engines for export, and that market is shrinking around the world; although in terms of car production, 38% of cars made in the UK were electric in 2023, the most recent year the SMMT has figures for, so that part of the industry is well placed. Most of the support for the transition to electric driving will come from consumers enjoying having better cars with lower running costs, businesses saving money, and public concern about climate change and air pollution, but having the just transition fund will add another source of support.



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Question 9: What are your views on whether small volume manufacturers (between 1,000 and 2,499 registrations) should be subject to the 2030 requirements for cars and/or vans?

Answer. No. Small volume manufacturers should be subject to the 2030 requirements, particularly as in many cases they are luxury cars with large engines.

Question 10: What are your views on whether micro-volume manufacturers (fewer than 1,000 annual registrations) should be subject to the 2030 requirements for cars and/or vans?

Answer. Yes. Micro-volume manufacturers should be exempted 2030-35. The numbers of cars are too small to be worth bringing in scope.

Question 11: What is your opinion on exemptions for Special Purpose Vehicles from the 2030 requirements for cars and vans?

Answer. Yes. Special Purpose Vehicles should be exempted 2030-35. The complexities are not worth the emissions savings. However, all NHS purchases of ambulances should be electric, and the government should consider grants for individuals and organisations buying wheelchair accessible electric vehicles and for charities to buy electric minibuses.

Question 12: What is your opinion on exemptions for kit cars from the 2030 requirements for cars and vans?

Answer. There should be an exemption for kit cars, as the numbers are very small, although the micro-volume manufacturers exemption may be enough to cover it anyway.

Part 2: Vehicle Emissions Trading Schemes Updates

Question 13: Are the time limits on the current flexibilities in the ZEV Mandate for cars and for vans still appropriate? Please explain your answer.

Answer. Yes, they are still appropriate for cars, where the companies have had a long time to prepare, plug-in market share is growing well, and stability is desirable. It would be worth considering an additional two years of flexibility for vans where the market trajectory is less firmly established.

Question 14: What are your views on the proposal to implement a van-car transfer in VETS? Please explain your answer.

Answer. This is a mildly useful extra flexibility and should be implemented as an additional support for decarbonising the van market.

Question 15: Are there other flexibilities that should be considered within VETS for cars and vans?

Answer. No strong views on this.

Question 16: Do you agree that VETS should be amended to account for the UF change? If so, do you agree with the proposal set out? Please explain your answer.

Answer. Yes. Obviously the low emissions ratings for PHEVs in previous years were unrealistic, and industry and public should be aware of the real average emissions, but it is reasonable to give the industry a grace period up to 2028 before having to use the true figures. Stability and helping the industry and investors to plan are important for VETS to work well.

Question 17: Do you agree with the proposal to allow UK derived or EU derived WLTP specific emission reference targets to apply from 2021-2023 in the United Kingdom, and in 2024 in Northern Ireland? If not, why?

Answer. No strong views on this.