

Motorcycle Action Group (MAG) response to:

**Consultation on ending the sale of new petrol,
diesel and hybrid cars and vans**

This version: 2020 07 30

About MAG

MAG is the UK's foremost riders' rights organisation. We have 58,000 members and represent the interests of the motorcycling community in a logical and data-based manner. We seek to influence outcomes using logical and reasoned argument. MAG has no party political affiliations.

See:

<https://www.mag-uk.org/>

Contact:

Central-office@mag-uk.org

01926 844 064

Background

The Motorcycle Action Group welcomes the Government's call for views on bringing forward the end to the sale of new petrol, diesel and hybrid cars and vans from 2040 to 2035, or earlier if a faster transition appears feasible. We have made attempts to establish the exact details of current Government policy and any implemented statutory levers to achieve the end of the sale of new petrol, diesel and hybrid cars by 2040. We feel it is vital to firstly understand exactly what regulations currently exist, and the exact detail of what is being proposed.

Our efforts to achieve this understanding have, however, revealed that there is much exaggeration and confusion regarding what is proposed and enacted. This is, in turn, leading to extreme differences of opinion within our own membership and the wider community.

We established through direct communication with the Office for Low Emission Vehicles (OLEV) that the current proposal applies only to cars and vans, not to motorcycles. We are concerned, however, that the most recent Committee on Climate Change (CCC) report ([Reducing UK emissions, Progress Report to Parliament](#); June 2020) specifically recommends: “Confirm bringing forward the ban on new petrol/diesel and plug-in hybrid car/van sales to 2032 at the latest. Apply the same rules to motorcycles.”

Interestingly, MAG has been reprimanded by the press office of the Department for Transport for using the term “ban” in reference to this consultation, yet that is exactly the term used by the CCC in its report, demonstrating that there seems to be extreme confusion at all levels regarding what is currently the Government’s policy.

Our research into the current position centred on the date of 2040 suggests that this is a policy linked to the Government’s Air Quality Plan. The July 2017 DfT/DEFRA publication “[UK plan for tackling roadside nitrogen dioxide concentrations](#)” contains the brief statement “The government will end the sale of all new conventional petrol and diesel cars and vans by 2040. “

This statement led to immediate headlines stating “[Britain to ban sale of all diesel and petrol cars and vans from 2040](#)”.

It should also be noted that this statement was framed in the Air Quality debate, not the Climate Change debate. We believe that these are two entirely separate debates, and continued conflation of action to deal with one confuses action to deal with the other as seen with now widely accepted mistakes made in the decision to promote diesel over petrol cars.

The end of the sale of these vehicles can reasonably be considered as achievable by two mechanisms: firstly, regulation/restriction or, secondly, by removing demand through development and availability of better alternatives.

We believe that lack of clarification - or perhaps selection of one of these options - since the 2017 Air Quality plan has thus created the current misinformation and confusion. We would urgently request that the Government clarifies exactly what the policy position is to be. This consultation is not based on a proposed policy position, but rather seems to invite views that will enable a policy position to be created. We hope that current levels of confusion amongst all parties will thus be rectified to enable a productive debate and formulation of policy.

The pre-amble to this consultation states “This reflects the Independent Committee on Climate Change’s advice on what is needed in order for the UK to end its contribution to climate change by 2050”. It would seem, therefore, that this consultation marks a shift in mandate from air quality to greenhouse gas emissions, i.e. from nitrogen dioxide and particulate matter to carbon dioxide. We also express concern that the opinion of the CCC is being given preference and priority over the views of other bodies and individuals. Thus the most likely outcome will indeed be a ban on the sale of petrol, diesel and hybrid cars, vans and motorcycles by 2032.

This would be a result that we would reject both in terms of its output and also in terms of the bias and favour given to one independent, un-elected body in its formulation. We trust that the views of all parties will be given adequate and equal weight in this debate.

MAG’s Position

MAG’s position is that a ban or any enforced phase-out of petrol/diesel/hybrid cars and vans and, more especially, motorcycles is wrong and should not become Government policy. That said, we welcome all efforts to reduce the environmental impacts of the transport sector in the UK and have long campaigned for motorcycling as just such a solution. Motorcycles, as a transport option, can help achieve goals to both [improve air quality](#) and [reduce greenhouse gas emissions](#) as well as having many other positive benefits beyond these two key considerations in this particular debate.

As an organisation, MAG’s role is to defend the rights of riders. We believe that a ban or any enforced phase-out of petrol motorcycles by any arbitrary date will be, at best, unnecessary or, at worst, undesirable. We make our argument on the basis of motorcycles, but also believe that the same arguments can apply for petrol/diesel/hybrid cars and vans.

Consensus in views

The Motorcycle Action Group exists to defend motorcycling. We are not an environmental lobby group. Our members, and, we believe, the entire motorcycling community, are united in the belief that motorcycling is a legitimate transport mode that should be supported and embraced by Government policy. The term motorcycle is used to represent motorcycles,

scooters and mopeds and, crucially, regardless of the power source (i.e. petrol, electric batteries, hydrogen, diesel, ethanol, synthetic fuels or anything else.)

There is naturally a spectrum of beliefs and opinions on environmental issues amongst our members that broadly reflects the spectrum of views outside of the motorcycling community. Some members already embrace electric motorcycles whilst others choose conventionally powered motorcycles. Some are willing to switch from petrol to electric, others are not. As an organisation we are not mandated to give definitive views on environmental matters on behalf of our members beyond situations when environmental policy directly impacts the right to ride motorcycles.

In the case of the sale of petrol motorcycles, this does directly impact a proportion of our membership who choose to ride petrol motorcycles or, more specifically, choose not to ride electric motorcycles. This section of our membership is currently the vast majority. As long as we have members who wish to ride petrol powered motorcycles, we will defend their right to do so.

Choosing to ride a petrol powered motorcycle does not make an individual evil, nor justify any kind of social exclusion, ridicule or attack. We will not accept any attempts to unreasonably restrict the right of any individual to ride and thus, by implication, buy a petrol powered motorcycle, in the absence of a proven direct harm caused to others.

There is no evidence that a single motorcycle can adversely impact air quality nor total GHG emissions.

Collective Responsibility

The above position should not be taken to imply that the concept of collective responsibility for motorcyclists as a group is deemed irrelevant. It is clear that as the numbers increase, the vanishingly small contributions to air pollution and CO2 emissions for a single vehicle become significant.

We must therefore review the overall number of motorcycles and their combined contribution.

As MAG has demonstrated for both [air pollution](#) and [CO2 emissions](#), motorcycles produce less emissions mile for mile than cars. More importantly, the proportion of miles travelled by motorcycles is tiny in comparison with the total miles covered for all road vehicles. Motorcycles - as we are frequently reminded - account for less than 1% of all traffic.

Electric motorcycles are available on the market and, whilst take-up of electric motorcycles is lower than for cars (a result, in our view, of the trailing policy and fiscal support for electrification of the transport mode), the proportion of petrol powered motorcycles is reducing and will continue to do so.

We are unable to predict the proportion of petrol powered motorcycles that will be sold by 2032/35 or 40, and, indeed, that proportion is - in part - in the hands of policy makers and the level of incentive that they provide to support this

preferred path. It is, however, clear that the collective contribution of motorcycles to both air pollution and CO₂ emissions is not, and will not be, significant; now - nor at any point in the future given current share of the transport sector.

For this reason the enforced restriction of the option to choose a petrol powered motorcycle is unwarranted and disproportionate to the impact that such a choice would have on air quality or GHG emissions.

Inequity in incentives

The Government is proud of the incentives and initiatives to promote the switch from petrol/diesel cars to electric. The plug-in grant for cars was launched in 2011, providing a grant of up to £3,000 towards the purchase of electric cars. For motorcycles, the grant was not introduced until 6 years later, in 2017, and is valued at just £1,500.

Indeed, the grant for cars encompasses hybrid vehicles that emit up to 50g/km CO₂. Many smaller petrol motorcycles and scooters produce less than 50g/km CO₂ but are not eligible for a grant.

With the difference in pricing between electric and ICE cars compared to the difference in price between electric and ICE motorcycles, we would argue that both the start date and value for the grant should have been reversed.

When it comes to messaging, there is a complete lack of promotion of electric motorcycles from Government. Mention of electric motorcycles has to be forced out of Government spokespeople and ministers by lobbyists such as ourselves, despite the fact that an electric motorcycle is clearly a more environmentally friendly option than an electric car. This reticence to push electric motorcycles to any market - even the existing motorcycle market - is, in our view, negligent and unfair.

With regard to charging infrastructure, there is also a complete blind-spot when it comes to the needs and requirements of motorcyclists. No discussion or innovation has been introduced or considered to provide charging solutions for electric motorcycles and scooters in public spaces. Some infrastructure designed for cars is usable, but not universally so, and certainly from the perspective of ergonomics and security, motorcyclists' needs are not considered at all.

Introducing a policy start date for the restriction or ban on the sale of petrol motorcycles in line with that for cars and vans in 2032/35 would be equivalent to introducing a ban on petrol and diesel cars in 2021 in terms of the support and incentives provided. This would clearly be totally impractical. A ban for petrol motorcycles coinciding with one for cars would be grossly unfair.

We also express concern that current plug-in grant incentives benefit only the wealthier elements of society who have less need for support. It is shown that motorcyclists tend to be skewed to lower socio-economic groups. This is natural,

given the economic benefit of motorcycles as a cheap transport mode. A £1500 grant on a motorcycle that costs more than a car is of no benefit to an individual who can only afford a cheap motorcycle. We would propose alternative technology motorcycles subsidised to make them affordable at the lower end of the utility market, not the upper end that consists mainly of hobbyist riders that use their motorcycles for leisure only. Currently, the only mainstream motorcycle manufacturer producing an electric model is Harley Davidson. Retailing in excess of £28000, this is a luxury model that is irrelevant to the majority of riders. Offerings from start-up companies naturally have hurdles to clear in terms of reputation, reliability and build quality. Possibly the most established electric motorcycle brand is Zero, but their latest models, retailing at over £17000, still do not fit the bill of an affordable transport solution that will be adopted in sufficient numbers to become mainstream.

A larger grant on motorcycles - equivalent to the A2 licence class commuter models - to make them equal in price would stimulate far more uptake, thus generating the necessary sales volumes to bring prices down in the medium to long term. This would create a sustainable growth in electric or other technologies. The grant should also be available for any low/zero carbon technology, not just battery electric.

The need for a ban is a demonstration of policy failure

If we start from a fair and reasonable assumption that the population is not resolved to destroy the planet and wreck their own health, it is fair to assume that with a little education and signposting they will naturally select zero emission vehicles if all things are equal. In the circumstances where the only difference between two transport options is that one may harm the environment while the other definitely will not, it is reasonable to assume that the non-damaging choice will be made by the vast majority.

In such circumstances, there would be no need to ban the sale of petrol, diesel and hybrid vehicles as there would be no significant demand for them. For the tiny minority that find justification for a more environmentally questionable choice, due to whatever specific circumstances and drivers that influence their decision, there is no enforced restriction as their actions will be insignificant on a global or even local scale.

Introducing a ban on something that does not happen is illogical. Furthermore, a ban at an arbitrary date that generates hardship or even inconvenience is likely to generate resistance and thus be counterproductive to achieving the goals laid out.

We are happy to work with the Government to promote policies that make environmentally benevolent choices possible for all. This, in our opinion, means that the structure of current incentives needs to be revised. Bringing forward a date when the sale of petrol motorcycles ends is best achieved by supporting and investing in industry to develop viable motorcycles powered other than by petrol at a price point that is attractive to the market.

We are concerned that a blinkered backing of a single horse, namely battery electric vehicles, may restrict and diminish options that could lead to better solutions. We see no value in banning any technology as evolution of better solutions will lead to a natural uptake of those solutions. When transport switched from horse and cart to motor cars, the horse and cart was not banned. In the evolution of transport technology many evolutionary cul-de-sacs have seen the demise of certain solutions without the need for them to be banned. A Darwinian natural selection of the best technologies will always lead to better solutions than the morally questionable extermination of a solution that is less favoured.

We can no more legislate innovation than we can predict the future. If that were possible, we would advocate that the Government legislates the invention of Star Trek transporters to solve all our transport problems!

Our recommendation is thus that the phase out of the sale of petrol/diesel and hybrid vehicles should be stated as an ambition with a specific and measurable target date. The policy levers to achieve the target should be clearly communicated as being confined to incentives and investment in a broad base of innovation combined with mild, short term fiscal support where necessary to enable the entire market to adopt superior products.

Response to specified consultation questions:

1) the phase-out date

It is inappropriate to set a date for a mandatory phase-out of existing technology when:

- a modal shift to motorcycles can be made now, reducing congestion, emissions and pollution*,
- advances in vehicle and fuel technology is seeing existing vehicles becoming more efficient and running cleaner,
- the alternative vehicles are still in development,
- the infrastructure - or plan to implement such infrastructure - is not there to support the next generation of vehicles (in particular, motorcycles),
- changing to a single technology such as electric is fraught with its own issues such as concerns over the availability of sufficient, clean electricity, access to motorcycle charging infrastructure, and the safety, production and disposal of batteries,
- it is not possible to predict the availability of alternative vehicles and the cost of such vehicles (which, at present, is prohibitive to many),
- Government-funded and private investment projects in new internal combustion technologies and fuels are ongoing.

*Leuven study https://wiki.mag-uk.org/images/1/15/TM_Leuven_Report.pdf

A phase-out of the sale of petrol, diesel and hybrid vehicles will naturally occur when alternatives are available that overcome all existing barriers to their purchase. Predicting the date of such availability is impossible. Imposing a date that precedes the availability would be detrimental and should thus not be entertained.

2) the definition of what should be phased out

It is inappropriate to phase out existing technologies through law, because technology has a natural lifecycle whereby it becomes outdated or obsolete without the need for Government intervention. Traditionally fuelled vehicles still have purpose and use; therefore, a ban on their sale is inappropriate. Alternative vehicles are not yet commonplace for many reasons, and a ban on vehicle type to enhance the sale of alternatives creates an artificial market.

No ban should be implemented because:

- whilst enthusiasts will keep a vehicle running, many vehicles have a 'natural lifespan' and will be scrapped,

- the market naturally evolves, with manufacturers bringing new vehicles with new technologies to the marketplace and by consumers making a choice to suit their needs from the options available,
- restricting the market restricts innovation,
- incentivising a particular technology artificially promotes that technology,
- advances in vehicle and fuel technology are seeing existing vehicles becoming more efficient and running cleaner; therefore, they should not be banned by Government,
- alternative vehicles are still in development, so to ban one technology in favour of another is – at best - premature and - at worst – naïve,
- Government does not have a good track record on making such decisions: i.e. diesel good, then diesel bad,
- Industry is no longer trusted by many, e.g. the VW emissions saga,
- different vehicles with different technologies suit different needs; therefore, to simply ban the sale in a sweeping way alienates businesses and individuals,
- to phase anything out should be a natural progression or - at the very least - follow a prepared implementation strategy for the next incarnation without the need to implement a ban,
- a clear, proven analysis in respect to the proposed objective of the ban (between existing vehicles and those which are to replace them) is necessary to make an informed decision.

3) barriers to achieving the above proposals

There are unknown factors relating to the commercial availability of affordable alternative vehicles to suit all purposes, including a lack of confidence from the consumer in the proposed replacement technology, the infrastructure to support it and the belief that it is in anyway better than that which it replaces. In addition, cost and availability; not only of the next generation vehicle but also the infrastructure to support an increased use in the selected technology.

A clear, proven analysis in respect to the proposed objective of the ban (between existing vehicles and those which are to replace them) is necessary to make an informed decision.

If many are to make the move to alternatively propelled vehicles, the following concerns need to be addressed:

- where is the infrastructure to support it?
- range of vehicles,
- variation in range due to driving conditions, e.g. inclement weather,
- safety concerns around batteries,
- environmental and ethical concerns around batteries (mining of finite resources for the manufacture of batteries),
- lifespan and lifecycle of batteries,

- concerns around the generation of electricity: consistency of supply, lack of clean electricity generated within the UK,
- clear objective,
- cost,
- availability and track record of alternative technology vehicles,
- potential negative impact on freedom of movement (both social and business) due to additional time in planning and travel, resulting from charge cycles, refuelling issues and access to infrastructure.

4) the impact of these ambitions on different sectors of industry and society

An artificially enforced transition could result in transport poverty. Those that can afford new technology will do so, scrapping useable vehicles long before the end of their natural lifecycle and adding to the pollution of the planet. Those who have no choice but to keep using their traditionally fuelled vehicle will find running costs increase, fuel stations becoming less common, driving more miles to fuel up.

Issues that must be addressed to achieve an equitable transition include:

- increased costs,
- potential negative impact on freedom of movement (both social and business) due to additional time in planning and travel, resulting from charge cycles, refuelling issues and access to infrastructure.
- loss of UK sales, as new vehicles are imported from countries without a sales ban,
- lack of consumer confidence,
- range anxiety, particularly under varying travel / weather conditions,
- lack of infrastructure,
- availability of power source / battery concerns (see section 3. above),
- any real benefits, e.g. cleaner environment across not just localised areas but globally,
- alternative technology: running costs, service costs and intervals, lifespan,
- transparency in respect to plans relating to taxation.

5) what measures are required by Government and others to achieve the earlier phase-out date

MAG supports the transition away from petrol and diesel for the majority of trips but sees no need or benefit in an outright ban of the use of the fuels. A balance needs to be struck that achieves global decarbonisation goals but rejects evangelism, and morally questionable impacts on the lives and choices of individuals. Net Zero is not Zero emissions. Potential for alternative mitigation

such as carbon capture and sequestration permits room to accommodate use of petrol and diesel in moderation.

Measures to achieve an earlier phase-out date must be incentives not enforcement. We have listed potential for policy to incentivise users to switch to new technologies, but the greatest incentive is a genuinely superior product. Superiority in all aspects of the drivers of choice must be achieved to avoid unfair and potentially discriminatory policy:

- extend “Plug-in” grant to all alternative technologies,
- review level of grant available for alternative technology motorcycles,
- ensure grant structure is weighted towards practical commuter vehicles (particularly motorcycles), not high-end luxury vehicles,
- ensure benefits of any grant structure penetrates to all, not just the wealthy,
- ensure infrastructure investment is channelled to cover the needs of all transport modes,
- ensure investment is equitable to allow sufficient support to smaller scale industries such as the motorcycle industry,
- recognise the benefits of downsizing overall vehicle size and weight to the minimum required for each trip,
- remove all suggestion that draconian bans will be imposed.

It is self-evident that smaller, lightweight vehicles are, and will continue to be, more environmentally friendly than larger ones. This applies universally, whatever the fuel type or technology. The natural choice for any trip should be the mode and type that requires the least energy input to achieve. This must be viewed holistically in terms of complete vehicle lifecycle, from material extraction through manufacture, service life and then decommissioning.

Clearly, where demand exists in sufficient volume mass transit is the most efficient option. However, the need for individual motorised transport will never be entirely replaced by mass transit and active travel. Great care must therefore be taken to ensure that the needs for all trips and all circumstances must be considered.

In the space between active travel and mass transit we believe that the motorcycle has a vital and valuable role to play, but one that is currently overlooked and ignored due to prejudice, lack of insight and investment.