

26th April 2019



Sadiq Khan
Mayor of London
City Hall
The Queen's Walk
London
SE1 2AA

Request for suspension of ULEZ charges for powered two wheelers.

Dear Mr Khan

Further to my letter dated 1st March 2019, I am writing now to request an immediate suspension of charges for motorcycles and scooters in the Ultra Low Emissions Zone. Such a suspension is vital to avoid continued illegal charging of many pre-Euro3 machines as I shall explain below.

I feel it is important to note that I received no response to my previous letter in which I requested a delay to the implementation of charges for powered two wheelers in the Ultra Low Emissions Zone. I would point out that had our previous request been agreed, the current illegal charging of compliant machines could have been avoided.

Following a meeting with officers on 21st March 2019 we finally received confirmation by email on 28th March that the evidence used by Transport for London to justify the claim that "many older motorcycles are highly polluting" is the COPERT5 modelling data referenced by the National Atmospheric Emissions Inventory.

The Motorcycle Action Group has reviewed this data and makes the following points:

- Whilst the modelling data is based on some empirical data, that data is not made available.
- The modelling data demonstrates that an assumption is introduced for "emissions degradation" for older vehicles such as pre-Euro3 motorcycles. We cannot determine the accuracy of this broad assumption that is applied equally across all transport modes.
- Despite application of this assumption there are many classes of pre-Euro3 motorcycles that are rated as producing NOx emissions below the 0.15g/km standard that you have set for ULEZ compliance.
- We have received confirmation from Emisia, the producers of the COPERT modelling, that their model does not allow for the emissions benefit gained from motorcycles filtering through congested traffic.

It would therefore seem clear that TfL's cited evidence is, at best, highly questionable, and demonstrates that the ULEZ charge is knowingly being applied to vehicles that are below, and in many cases far below the emissions standard that has been set.

The Motorcycle Action Group is therefore formally requesting a suspension of charges for all motorcycles and scooters until an equitable and legal application of the charging system can be agreed, based upon the evidence that TfL cite, and any further empirical evidence that can be found.

We look forward to an urgent, formal response from you.

Yours sincerely

Selina Lavender
Chair
Motorcycle Action Group