

Evidence from Motorcycle Action Group regarding decarbonising road transport

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- 1 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?*

The main obstacle is the impracticality of forcing an entire road user network to electrify. Nor has the Government presented a convincing environmental case for it. It even ignores the additional cost and CO2 footprint of electric vehicle manufacture and the absence of clean charging power; and has not commenced a National Grid upgrade strategy. Thus, motorcyclists and other road users remain unpersuaded, and the EV market already appears to be reaching saturation point. Therefore, the dates for phase-out are neither achievable nor justifiable. It follows that the Government should abandon the forced shift to EVs and work intelligently with informed road transport practitioners to nurture responsible use of limited resources, instead of what increasingly looks like a 'greenwashing' EV agenda that harms the UK's economy, personal liberties, standards of living, and mobility, for no convincing benefits.

- 2. Do the 2030 and 2035 phase-out dates serve their purpose to incentivise the development of an EV market in the UK? To what extent are car makers focusing on one date or the other? What are the impacts of the deadlines on the ability of the UK supply chain to benefit and how could the Government seek to further support the development of the UK EV industry? Would the introduction of a plan with key dates and timescales support the development of the EV industry in the UK?*

The dates caused limited take-up by some; usually as an addition to a petrol or diesel one. However, with no credible logistical plan, and no databased case for compulsion, the 2030 and 2035 dates will primarily serve merely as provocation for citizens who won't, or can't, make the change. Consequences are unpredictable, but may include public rage at the ballot box as witnessed against ULEZ in the Uxbridge 2023 by-election. Car manufacturers have 'talked the talk' to an extent, but motorcycle representatives, including manufacturers, have clearly said in Ministerial meetings the Internal Combustion Engine (ICE) ban may ruin business in the UK. Logically speaking, the British vehicle industry will export ICE manufacture to other, more accommodating, localities - though electric vehicle makers may remain here. Since forced EV introduction will fail (see below), this would eventually mean large-scale imports of road vehicles – after Government policies terminate most British ICE car and motorcycle manufacturing. Introducing further key dates is futile, as the core proposition is unworkable. The only sensible option is to abandon forced EV deadlines altogether and let the market decide.

- 3. What specific national policies, regulations or initiatives have been successful, or have hindered, EV adoption to date? Are these policies or initiatives fit for purpose?*

Despite financial incentives, the primary hindrance to EV take-up is their unattractiveness to many road users (see below) and the failure of the Government to make the case for them.

Barriers include higher costs, safety issues, range anxiety and - at a strategic level - no credible plan to expand the National Grid to supply tens of millions of vehicles with charging power.

- 4. Given that the Government should apply a behavioural lens to policy—which involves people making changes to their everyday lives, such as what they purchase and use—is there a role for clearer communication of the case for EVs from the Government? If so, who should take the lead on delivering that?*

This question is disturbing. ‘Nudging’ people to follow Government policy is a disaster in the making. If ‘behavioural lens’ activity is needed to force past the flaws in the EV scheme, Government becomes potentially legally liable for the consequences, having been warned about them (including in this consultation response from MAG) - including higher costs, increased fatal EV fires, grid outages and millions of tonnes of unrecyclable battery waste.

- 5. What is your view on the accuracy of the information in the public domain relating to EVs and their usage?*

In contrast to the Government’s dogmatic EV policy, numerous reports state a 100% shift is undeliverable and counterproductive in environmental, social and practical terms. This is at variance to the Government’s dogmatic insistence on 100% EV private transport. The Government has yet to respond comprehensively to strategic and practical criticisms of the EV policy.

- 6. What are the overall environmental benefits that would result from achieving the 2030 and 2035 targets?*

Electric vehicles - using current battery technology – don’t reduce the environmental footprint versus petrol or diesel equivalent vehicles. Recycling is not practical for batteries. The Grid infrastructure cannot provide ‘clean’ energy, so CO₂ production continues for the electricity needed for charging. Furthermore, the Government has yet to provide plausible evidence to show how human-generated CO₂ is driving measurable climate change. If they have this evidence, let them publish it now: not commentary about consensus, but the explicit science they claim underpins that consensus, including a clarification of its perspective on CO₂’s absorption spectrum and its logarithmically declining impact. To date, the Government’s scientific justification has seemed unavailable for scrutiny – leading many to suspect it doesn’t exist.

- 7. What are the likely costs that will be faced by consumers as a result of the Government’s phase-out dates for non-zero emissions vehicles? Are there policies or initiatives that the Government could use to specifically target barriers arising from unpredictable costs to the consumer, for example significant fluctuations in the cost of electricity, changes to road taxes, or the introduction of low emission zones?*

The costs are financial, power rationing, a recharging infrastructure crisis, fatalities associated with EV fires, and the poor resale value and usability of older EV vehicles.

8. *What are the main routes for acquiring an EV? Which aspects of these routes are working well, and which aspects could be improved?*

Commercial outlets. This is an irrelevant concern. The market will always deliver demand.

9. *What are the main consumer barriers to acquiring an EV, either through purchasing, leasing, or other routes?*

Cost. Fire risk. Range anxiety. Resale value.

10. *How is the Government helping to ensure that EVs are affordable and accessible for consumers, and are these approaches fit for purpose?*

The Government has successfully incentivised some people to buy EVs. However, artificially forcing market growth is unsustainable in the longer term. They do not erase the myriad problems associated with the EV policy.

11. *Do you think the range of EVs on offer in the UK is sufficient to meet market needs? Which segments are under-served and why? Why is the UK market not seeing low cost EVs, particularly in comparison to China?*

No. EVs that replace petrol and diesel vehicles, like-for-like, in terms of cost and performance, have not yet been made commercially available. This is particularly true of the motorcycle sector. EVs cost more than their petrol and diesel equivalents. Only some new, yet-to-be-rolled-out, technology can alter this.

12. *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?*

Motorcycles have long been the vehicle of choice for low cost, low congestion travel. However, Government has never shown any sign of proactively promoting this clean, low-emissions and nimble means of transport. L-Cat and have a similar appeal. If Government wishes to promote them, it must, for consistency, also proactively promote motorcycles and scooters.

13. *What is your assessment of the current second-hand EV market? How is the second-hand EV market projected to develop between now and the phase out dates?*

Older EV values are poor because compromised batteries are the most expensive part of an EV to replace.

15 *What barriers are there to achieving a sufficient supply of second-hand EVs, mindful that second-hand vehicles make up a high proportion of all vehicles purchased?*

The primary problem is older vehicles lose their power storage capacity. This undermines the EV second-hand market massively, unlike the second-hand ICE vehicle market.

16 What is the value and role of alternative transport models such as car clubs and micro mobility vehicles in the Government achieving the 2030 phase out date, and how should the Government consider their roles and opportunities for use in transport decarbonisation?

This question implies the Government might consider restrictions on private vehicle usage. Such action will enrage the public. However, should such a policy be attempted, it must start at the top, with all politicians leading by example by formally and publicly reducing their own access to private vehicles. Anything less would qualify as hypocrisy and no politicians can expect the public - whom they serve - to do things politicians will not.

18. What are the main challenges that UK consumers face in their use of EVs?

Range limitations, high cost of purchase and charging, absence of recharging infrastructure, power rationing or blackouts, fire damage and fatalities.

19. What are the main benefits that UK consumers could realise from using an EV?

Smoother and faster power delivery, convenience in certain low mileage scenarios, quietness.

21. How does the charging infrastructure for EVs need to develop to meet the 2030 target? Does the UK need to adopt a single charging standard (e.g., the Combined Charging System (CCS)) or is there room in the market for multiple charger types?

The EV charging infrastructure rollout is already a self-evident disaster. The Government will not deliver the required infrastructure in time. If 100% of private vehicles on sale are EVs by 2035, this will lead to transport paralysis in the UK. The single charging standard was an obvious need, but it's too late now, and so Government presides over chaos - comparable to the botched 'smart meter' rollout. The idea of multiple chargers in a market where the Government is falling ever further behind in charging infrastructure is yet another reason the initiative will fail.

22. The Government recently published the draft legislation of "Public Charge Point Regulations 2023". What assessment have you made of the draft legislation text, and what contribution will it make in ensuring the charging experience is standardized and reliable for consumers?

It will not resolve the charging infrastructure problems, national grid upgrade needs, nor deliver adequate energy provision for the EV rollout dates – even if those dates were pushed back by a decade.

23. What assessment do you make of the requirements set out in the draft legislation of "Public Charge Point Regulations 2023" for charge point operators to make data free and publicly available, and how may this improve the EV charging experience for consumers?

This will help marginally, but the private sector will deal with this anyway.

24. In terms of charging infrastructure, are there unique barriers facing consumers in areas of low affluence and/or multi-occupancy buildings, such as shared housing or high-rise flats? Do you consider public EV charging points to be accessible and equitable compared to home-charging points? What can be done to improve accessibility and equity?

The EV agenda is unattainable by the less wealthy, who are being legislatively prevented from even having their own parking spaces in some areas - such as in London. Incredibly, EV advocates seem to assume EV users can simply park somewhere overnight and charge them up. How will residents in less wealthy areas charge their vehicles – or is the Government’s plan that all the less wealthy will no longer share the same right to private transport as wealthy people with private parking?

25. Is there a financial benefit to the consumer of choosing an EV over an ICE vehicle? Are there further benefits, aside from financial, that a consumer may gain from EV use?

No. Generally, costs will be higher for purchase and, given huge on-costs for green electrification of the grid and upscaling it to provide all the extra power, the electricity itself. Plummeting re-sale value is another de facto cost. In some limited cases, if the user can afford the higher cost of the vehicle in the first place, they may initially benefit from reduced running costs. For many, this calculation will not lead to a net saving over time.

26. What options are there for consumers for end-of-life management of batteries and EVs, and what impact does this have on consumer attitudes towards buying an EV?

None. There is no practical way to recycle EV batteries on a large scale. Economically, it’s currently a non-starter.

27. What are the current regulations and responsibilities of disposal and recycling for EVs, and how effective are they? How much of the battery can be recycled from a technical standpoint, and how much of that is economically feasible?

Despite all the talk, very little of an EV battery pack can cost-effectively be recycled. The energy used to recycle the battery is great, further eroding any pretence that EV batteries are a green option. As long as current battery technology doesn’t evolve, nor will any prospect of mass-scale recycling.

28. Is there a risk that the residual value of EVs may be lower than the value of the EV as a source of recoverable critical minerals, and how might this effect the flow of EVs into the second-hand market?

Not really. This is wishful thinking. In the future, it might be possible to recycle the contents of millions of tonnes of old batteries. At present, this is simply a way to lock up earth’s precious resources in old batteries for the indefinite future.

29. What are the challenges or concerns around grid capacity in relation to significantly increased EV adoption?

The UK Government can't deliver the power required for a like-for-like replacement of petrol motorcycles and petrol and diesel cars in even the next two decades, let alone five years. Furthermore, since Government will have to ensure 'spinning reserve' to compensate for the variability of wind and solar power, it needs to explain why this initiative can cut CO2 emissions, fossil fuel will provide that reserve (nuclear power can't happen in the timescale set for EV rollout). Transmission and charging losses also increase the overall amount of CO2 generated. CO2 emissions are higher in EV manufacturing versus petrol and diesel motorcycles and cars. It behoves Government to respond seriously to these issues, instead of pretending they don't exist.

31. What are the requirements, challenges or opportunities for the development of public charge point delivery across the UK? How will the development of EV charging infrastructure in the UK interact with existing planning regulations?

Millions of charging points are required – enough to provide comparable charging convenience versus the current petrol station network. There is no hope of the Government addressing the need for sufficient multiple-connector charging facilities (connector variations are, de facto, already built into the EV fleet, and so must be catered for), mass charging facilities – for example, after significant traffic jams on a very hot or cold day or after a road blockage – and the core issue: sufficient grid capacity. The opportunity is likely to be windfall profits for independent entrepreneurs who correctly guess the pinch points in the charging system, and satisfy demand – for instance with charging facilities at strategically important places in the road network powered by reliable, self-contained power sources such as diesel generators. Existing planning regulations are clearly a barrier. The Government faces the invidious option of reducing regulatory restrictions and increasing risk. The 'building-cladding' episode is a salutary reminder of the dangers of insufficient regulations, with all the liability implications – this time for Government. We warn you in this submission of potential legal liabilities as a result of relaxing EV charging regulations; and thus, there is no opportunity to deny foreknowledge of such a potential issue; a warning likely to be a significant factor in any putative court cases.

32. What are the issues facing rural residents, urban residents, and sub-urban residents and how do they differ?

EV is not currently attractive for agriculture, heavy construction, rural life, suburban residents and densely populated urban environments. Unless the Government unveils a miraculous rollout plan for charging facilities and grid improvements for sparsely populated and suburban regions, and densely populated housing estates, the only place where EV rollout can be smoothly applied is where private citizens have their own parking spaces, access to multiple charging options with all the required charging adaptors and sufficient existing grid capacity. Quite possibly, for a 100% like-for-like shift from petrol motorbikes and petrol and diesel cars to EVs, no part of the UK, urban or rural, fulfils these criteria.

33. What role do you see local authorities playing in the delivering the 2030 phase out target, particularly in relation to planning regulations, charge points and working with District Network Operators? How can government best support local authorities in their roles?

Local authorities face exactly the same logistical and financial issues already outlined in this submission. They can't afford vast expenditure for - infrastructure and nor should they. This is a Government – not local Government – driven scheme. It may rupture the relationship if Whitehall attempts to download the problems on local authorities.

34. What are the successful approaches to the rollout and uptake of EVs in other countries, and what can the UK learn from these cases?

California is the most comparable market to the UK in terms of EV rollout. It has a similar though wealthier population of 39 million. Even there, despite all the incentives, nudging and stated political ambitions, new EV car sales constitute less than a quarter of all vehicle sales.