



## **Consultation on when to end the sale of new non-zero emission L-category vehicles**

### Response from the British Motorcyclists Federation (BMF)

The British Motorcyclists Federation (BMF) welcomes the opportunity to respond to this consultation. The BMF is a lobbying group with 64,000 individual and club members that campaigns to pursue, promote and protect the interests of riders. The BMF is also a founding member of the National Motorcyclists Council.

#### **Motorcycles and decarbonisation**

The benefits of Powered Two Wheelers (PTW) are acknowledged throughout the consultation, which is welcomed by the BMF. One of these advantages is that they make up only a small proportion of the transport network's GHG emissions, and the BMF believes that internal combustion engine (ICE) PTW should play a big part in the transition to net-zero. Whilst it is true that 'every little helps' when reducing emissions, if the timing is wrong and there are insufficient alternatives, battery electric or otherwise, on the market, riders may turn to cars.

The BMF conducted a survey of members, to gauge their reaction to the proposed phase-out dates and their uncertainties regarding electric motorcycles. When asked what they would do after the phase-out dates 89% of respondents stated that they would ride their existing ICE bike for as long as possible. While nearly half of those would then stop riding altogether almost as many would eventually use an electric bike. Research from Bikesure highlighted various worries that riders have about going electric, for example range anxiety, access to chargepoints and affordability ([Electric Motorbikes and Scooters Survey | Bikesure](#)). Respondents to the BMF survey demonstrated similar concerns and uncertainty. The BMF's concern is that arbitrary dates are being proposed, and in our opinion the consultation does not provide any real assurance that riders' concerns will be addressed.

Regarding the scope of the consultation, it is stated that lifecycle emissions are out of scope. The BMF does not agree with this, given the recent research into comparing lifecycle emissions of PTW, cars and EVs ([Powered light vehicles can enable transport decarbonisation: Life-cycle analysis shows lighter vehicles can enhance contribution of electrification to climate goals | MCIA](#)). Another concern raised in the BMF survey was about the environmental impacts of the manufacturing and disposal of ZEV, especially replacement batteries.

The development of non-zero emission motorcycles is unlikely to follow the same path as cars as there are different constraints such as size, weight and battery power. Again,

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respondents to the BMF survey felt that this was a barrier to the uptake of electric motorcycling, and 53% of respondents felt that products with better batteries and range may encourage them to ride electric. 49% also felt that affordability was a factor, which is likely due to the lack of product and competition in the market. It is clear that the needs of current riders are not being met with the available product, therefore although the application of this regime may be effective for cars, it doesn't follow that motorcycles should be treated the same way. The UK must remain in-step with international, and particularly the rest of the European, market plus research and development towards net zero to ensure availability of good quality products. Divergence from this risks market shocks and market withdrawal.

The current charging infrastructure is also not sufficient to cater for electric motorcycles, and they are often not considered at all during development. This causes more concern for riders who are being encouraged to go electric, and with the current batteries not providing enough range, adequate charging needs to be in place. Some concerns raised by BMF members were that chargepoints must be secure to deter thieves, and that charging should be standardised. This is an issue across all EV charging, with chargepoints requiring different forms of payment and vehicles using different cables. There should be adapters available, especially as carrying them on a PTW is impractical.

The BMF welcomes the assurance that there will be no ban on the use of non-zero emission motorcycles or second-hand sales. This assures that motorcycling will remain an affordable mode of transport. 89% of our members responded that they wish to keep their existing motorcycles running for as long as possible. ICE PTW are not going away, particularly classic motorcycles and related events. These provide a source of entertainment for many people, and many motorcycles are not just used as a means of transport for commuting etc. It is important that there is still affordable fuel available to run them.

We note the valuation placed on the motorcycle industry in the consultation paper which is correct as far as it goes but does not include the substantial contribution to the national economy from motorcycle sport, other events based around motorcycling, the small businesses associated with the upkeep of motorcycles, supplies of spares and other equipment and the economic contribution made by riders using the hospitality industry.

## Consultation Questions

*Q1: Do you agree or disagree with our approach to end the sale of all new non-zero emission L-category vehicles by 2035 at the latest? Please explain your answer.*

- Agree
- Disagree
- Don't know

Disagree. The BMF is opposed to any arbitrary date ending the sale of new ICE L-category vehicles. As previously outlined, the BMF strongly encourages an approach that is in line with the European market.

*Q2a: Do you agree or disagree with our approach to end the sale of new non-zero emission L-category vehicles in the L1, L2, L3e-A1, L6 and L7 subcategories by 2030? Please explain your answer.*

- Agree
- Disagree
- Don't know

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Disagree. Sales of ZEV in the L1 category is already increasing steadily and the BMF's view is that we should continue to let the market decide rather than enforcing arbitrary dates, as mentioned above. With the current trends in these sales, there is no reason why the overarching 2050 target for net-zero would not be met, therefore there is no real need for the 2030 deadline.

*Q2b: What are your views on ending the sale of new non-zero emission L1 vehicles before 2030?*

Please see response to Q2a.

*Question 3: Should there be or should there not be derogations as part of the phase out of new non-zero emission L-category vehicles and if so what?*

- *Yes, there should be derogations*
- *No, there should not be derogations*
- *Don't know*

Yes, there should be derogations. The BMF cannot comment on military services, however derogations will likely be necessary to be able to supply groups such as Blood Bikes whose requirements may be better met by traditionally-powered bikes. Smaller manufacturers may also benefit from derogations, similar to those under EU Regulation 2019/631.

*Q4: What role, if any, do you think alternative fuels have to play in the transition period to zero emission L-category vehicles?*

The BMF supports a technology-neutral approach and does not feel that battery-electric is the only route to reaching net-zero. The BMF notes that although the consultation states that the government is technology-neutral, they are only subsidising battery electric options. The production and use of alternative fuels to keep ICE PTW running should be a part of the solution. Not much is known in 2022, however research into e-fuels, hydrogen fuel cells and other technology is promising, particularly regarding aviation and motorsport. We are aware that some classes of motorcycle sport are particularly interested in development of alternative fuels and sports developments frequently transfer to road use. These technologies could potentially be used alongside battery electric as we move towards net-zero.

*Q5: What are your views on regulating L-category vehicles using a ZEV mandate target for manufacturers and/or introducing CO<sub>2</sub> emissions targets for L category vehicles, as is currently done for new cars, vans and HGVs?*

The BMF questions the value of using ZEV mandates in a market which is much smaller than the car/van market and which has wider variability. There is little value in mandates for the smaller bikes which are the larger part of the market and already converting, categories L6/7 are already mostly electric. The focus should be on supporting manufacturers to provide high-quality non-fossil-fuelled alternatives to ICE PTW and not trying to run too far ahead of the rest of the European market for the reasons outlined in the introduction.

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*Q6: What other support might be needed to encourage the uptake of zero emission L-category vehicles as part of a transformation of last mile deliveries?*

While the prices of electric L1/2/3 category vehicles is coming down they are still more expensive than ICE powered machines. A subsidy on these machines could encourage greater uptake by delivery companies. The BMF is not qualified to make recommendations on other L categories.

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