Smarter regulation: proposed changes to legislation for electrically assisted pedal cycles

Summary

- Logistics UK recognises that for some circumstances there are benefits for operators to increasing the maximum continuous rated power of the electric motor up to 500 watts from 250 watts.
- An increase in wattage for EAPCs may allow e-cargo bikes to handle inclines and gradients better and carry a higher payload, facilitating a reduced reliance on vans in urban areas and contributing to modal shift in this sector.
- Logistics UK sees no benefit to allowing EAPCs to have throttle assistance beyond the current walk mode which is a model that currently works for operators of e-cargo bikes.
- If regulation is proposed in the future for e-cargo bikes, we would expect carriage of goods activities to be treated as for motorised vehicles under the 'Hire & Reward' and on 'Own account' regulations.
- Operator training and provision of appropriate protective equipment responsibilities should adhere to existing Health and Safety regulations.

About Logistics UK

Logistics UK is one of the country's largest business groups, representing the entire logistics industry and supporting, shaping and standing up for safe and efficient logistics. Our membership of more than 20,000 includes global, national and regional businesses and SMEs spanning road, rail, inland waterways, sea and air as well as the buyers of freight services, such as retailers and manufacturers. As an organisation, we deliver services, representation and thought leadership, helping members and policy makers to seize new opportunities for the sector and the economy as a whole, right across the country.

What we represent

Logistics is a sector delivering an increasingly safe, sustainable and efficient system of national infrastructure – creating opportunities across the UK and linking the UK to the global trade network. Spanning land, water and air, it delivers for everyone, everywhere, every day.

- Logistics delivers big public value on small margins, ensuring the availability of the products households, businesses and public services rely on. It moves goods more than 200 billion tonne-km within the UK per year and enables the trade of more than £1 trillion of goods, while working hard to avoid adding pressure to the cost of living. This is a challenge with fuel and energy costs at a historic high and restrictions on logistics growing.

- The sector delivers smart, green, resilient growth and jobs. It contributes £163 billion to the economy each year (12% of UK non-financial GVA), employs 2.7 million people (8.2% of the UK workforce), pays £5 billion in revenue to Treasury through Vehicle Excise Duty (VED) and Fuel Duty, in addition to other taxes. It is becoming ever more innovative and integrated – within businesses and between logistics sites and transport modes. Its key hubs provide a catalyst for further growth and investment, helping places to thrive.

- Logistics delivers for the future, as an essential system for growth. It underpins the whole economy, with an economic footprint three times larger than its direct GVA contribution, with the public sector and other private sector businesses spending 15% of their total input-related spending on logistics services per year.

Consultation response

Logistics UK welcomes the opportunity to make a submission to the 'Smarter regulation: proposed changes to legislation for electrically assisted pedal cycles' consultation. We will be answering relevant questions that relate to the use of e-cargo bikes.

If regulation is proposed in the future for e-cargo bikes, we would expect any activities undertaken involving the carriage of goods to be treated as for motorised vehicles under the 'Hire & Reward' and on 'Own Account' regulations. Any responsibilities of operators to provide training should adhere to existing Health and Safety regulations and appropriate protective equipment provide by the operator.

Our members have indicated that commercial e-cargo bikes should have a requirement to display operator contact details to encourage good practice by the riders when in use, and to assist enforcement agencies in managing poor highway behaviours.

Question 1
Do you support or oppose the proposed change to how EAPCs are classified so that the maximum continuous rated power of the electric motor must not exceed 500 watts instead of 250 watts as set out in the current regulations?

Logistics UK recognises that for some circumstances there are benefits for operators to increasing the maximum continuous rated power of the electric motor up to 500 watts from 250 watts.

Question 2
Explain your response to question 1. Are there any additional benefits or risks (including in relation to road safety) not referenced in this document?

An increase in wattage for EAPCs may allow e-cargo bikes to handle inclines and gradients better and carry a higher payload, facilitating a reduced reliance on vans in urban areas for parcel delivery and contribute to modal shift in this sector.

Question 3
Provide any relevant evidence to support your responses to questions 1 and 2.

To give a sense of the scale, a major logistics operator currently operating several large hubs in the UK anticipates that electric cargo bikes and walkers may make over two million deliveries to customers across the UK every year. E-cargo bikes used in their operations are currently limited by incline with the current motor power of 250W. Therefore, there are cities and geographies that have been identified as unsuitable for e-cargo bike deployment due to gradient constraints. This is a limiting factor of the current regulation and an increase in motor power could unlock deployment in these locations.

Question 4
Do you support or oppose the proposed change to allow EAPCs to have throttle assistance up to 15.5mph (25km/h) without the need for type approval, instead of 3.73mph (6km/h) as currently regulated?

Logistics UK sees no benefit to allowing EAPCs to have throttle assistance beyond the current walk mode which is a model that currently works for operators of e-cargo bikes.

Question 8
Do you support or oppose limiting either or both of the proposals to e-cargo bikes? If applicable, provide views on how e-cargo bikes could be defined for these purposes. Explain your response and provide any relevant evidence.
Support.

Logistics UK wants to see a single standard and definition applied to e-cargo bikes across the UK to avoid complexity for operators, many of which will operate their fleets across administrative boundaries.

Draft EU CEN standards (EN-17860) are currently being debated to develop a blanket regulatory framework for e cargo bikes in the EU and we would encourage the UK to mirror these standards once approved to avoid regulatory divergence.

Logistics UK supports London's Cargo Bike Action Plan[1] which is aims to establish minimum and best-practice safety and training standards for cargo bikes, riders and operators. The plan also encourages operators to adopt best practice through safety schemes. Its overarching aim is to making cargo bikes a leading option for last mile freight and servicing trips.

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[1] https://content.tfl.gov.uk/tfl-cargo-bike-action-plan-2023-acc.pdf