DVA consultation – changing the exhaust emissions test for light vehicles with a modern diesel engine.

5 September 2024

Summary

- Logistics UK agrees that to implement a Particle Number (PN) test as part of the MOT would help to improve air quality and enhance the wellbeing of citizens.
- Logistics UK believes that its implementation for vehicles registered from 1 January 2013 is reasonable and would assist in creating a level playing field for all operators.
- Logistics UK urges the department to provide a reasonable period of grace between legislative change and implementation, with the roll out of a clear and effective communications plan by DVA to ensure businesses and citizens are aware in advance of its implementation and potential costs as replacement diesel particulate filters (DPFs) are expensive.
- Further clarity is needed on implementation, which is detailed below.
- Logistics UK members are strongly of the view that this change should not result in any test fee increase.

About Logistics UK

Logistics UK is one of the country's largest business groups, and the only trade association which represents all of logistics. Our mission is to support, shape and stand 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. 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.

The logistics sector

The logistics sector underpins the economy, safely and efficiently delivering for its households, businesses and public services, every day. It is critical, national infrastructure, comprising road, rail, maritime and air transport, together with warehousing, ports and other logistics hubs.

There is widespread consensus that UK productivity and growth is too low. By putting logistics first, with the right partnerships, regulations and investment, government can deliver productivity gains that will supercharge the UK economy by up to £8 billion per year by 2030.

- Logistics delivers big public value on small margins, ensuring the availability of the products households, businesses and public services rely on, every day. This strengthens connections between businesses and their customers, facilitating market expansion, boosting competition, and encouraging innovation.

- Logistics is a major sector in its own right. It contributes £185 billion to the economy each year (12% of UK non-financial GVA), is one of the UK's largest employers, providing good jobs with strong career progression – 2.7 million people (8% of the UK workforce) are employed in logistics roles, and its key hubs provide a catalyst for further growth and investment, helping places to thrive.

- Logistics has transformed the UK and is now delivering for the future. It helped deliver the country's canals, roads, railways, airports and ports, has driven revolutions in global trade and e-commerce and is now innovating to deliver decarbonisation and even greater efficiency.

Consultation response

Logistics UK welcomes the opportunity to respond to this consultation on the proposal to change the annual roadworthiness test by introducing an alternative exhaust emissions test, the Particle Number (PN) test, for cars and light goods vehicles registered from January 2013 and fitted with a modern diesel engine. We also note this consultation proposes the extension of this legislative change to include vehicles exceeding 3500kg gross vehicle weight to enable roadside enforcement checks to be carried out on modern light and heavy diesel vehicles to determine the effectiveness of the vehicle's diesel particulate filter (DPF). Logistics UK sought the views of our NI membership on the consultation questionnaire. Their feedback has informed this submission.

Logistics UK agrees that to implement a PN test as part of the MOT would help to improve air quality, improve our environment and enhance the wellbeing of citizens and believes that its implementation for vehicles registered from 1 January 2013 is reasonable and would assist in creating a level playing field for all operators.

We would however suggest that there should be a reasonable period of grace applied between legislative change and implementation and that DVA develops and delivers a clear and effective communications plan to ensure that businesses and citizens are aware in advance of its implementation, potential costs as replacement DPFs are expensive, and associated maintenance guidance. Logistics UK would be keen to know if any analysis has been carried out by the department in respect of the likely impact of the higher cost of a replacement DPF on private and commercial vehicle owners.

Logistics UK is concerned that DVA intends to implement the PN test to heavy diesel-powered vehicles at its enforcement roadside checks, without providing any clarity on the type of engine this would apply to, and parity with other European States. Clarity on these issues, and on the implementation date as soon as this is available, is needed.

Logistics UK members also note and welcome the commitment from DVA that as trials indicated that the PN test should take no longer to conduct than the existing petrol emissions test, no related test fee increase is envisaged at this time. Logistics UK will continue to monitor this issue.

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