Enabling road use of hydrogen-powered NRMM

24 April 2024

Summary

- **Hydrogen should be permitted for road use of NRMM.**
- **Retrofitting should not be discounted in future due to long life-cycle of NRMM.**
- **Other gases could be considered for future application.**

About Logistics UK

Logistics UK is one of the country's largest business groups, supporting, shaping and standing up for safe and efficient logistics. We are the only organisation representing the entire logistics sector.

We represent a sector delivering an increasingly innovative, productive and sustainable system of essential national infrastructure. This system ensures the availability of the products that households, businesses and public services rely on every day, and is supporting the UK's transformation for the future. Our membership of over 21,000 includes global, national and regional businesses and SMEs spanning the road, rail, sea and air industries as well as the buyers of freight services, such as retailers and manufacturers.

Response to consultation

Do you agree with enabling the road use of hydrogen-powered NRMM and agricultural vehicles?

The responses in this consultation will be limited to NRMM vehicles, excluding agricultural vehicles, given the composition of Logistics UK members and their vehicle fleets.

Logistics UK agrees with enabling the road use of hydrogen-powered NRMM, following the same regulatory route as cars, vans, buses and trucks by amending regulation 94 of the Road Vehicles (Construction and Use) Regulations 1986 (C&U). Avoiding the need to seek a vehicle special order (VSO) will lower the barriers to the wider uptake of low emission and zero emission NRMM. This will be an important step in assisting owners of these vehicles to take further steps towards Net Zero operations.

Do you agree in limiting the amendment to allow only new machinery powered by hydrogen?

Logistics UK asks for further consideration of this proposal to limit to new machinery, given the very different use case of NRMM compared to regular road vehicles. Certainly, in the construction industry, the asset depreciation of plant is calculated over a much longer period of time, compared to typical road vehicles. Restricting the switch to hydrogen-powered NRMM to new vehicles via the procurement cycle could potentially mean that some operators are faced with a significant period of time before they will be able to access this benefit.

Should we consider options to enable the safe retrofit of NRMM and agricultural vehicles to operate on hydrogen in future?

With reference to the answer provided above, Logistics UK would ask for consideration being given to allow the regulations to be drafted in such a way that would permit the safe retrofit in the future, should a company demonstrate full compliance with the agreed standard.

Do you agree with our approach to ensuring hydrogen safety is sufficiently covered in this amendment?

Logistics UK would ask the Department to consider the responses of the Construction Products Association for the answer to this question where it questions if the additional international regulation is required, given other safety legislation already in place and understood by the industry.

Do you agree with the proposed categories of vehicles (as defined in C&U) which will be the subject of the amendment?

Yes.

Are there other gaseous fuels that we should be seeking to enable road use of for NRMM and agricultural vehicles?

Other gases that could be taken under consideration could be bio-gas; compressed natural gas (CNG); and liquified natural gas (LNG).

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