# Final response: Zero Emission Vans – Regulatory Flexibility

**March 2025**


**Summary**

- Logistics UK members have submitted road safety data to OZEV that demonstrates these vehicles are no less safe than their ICE equivalent.
- Logistics UK believes there should be a full review of regulatory thresholds to assist the transition to zero tailpipe emission vehicles.
- The N1 classification threshold should be moved to 4.25tns to reflect the additional weight of the battery in zero tailpipe emission vans.
- Road worthiness testing of 4.25tn zero tailpipe emission vehicles should be a Class 7 MOT.
- Domestic drivers' hours should be used in place of assimilated hours.
- Tachographs should not be mandated but remain open to those who wish to use them.
- The requirement to install speed limiters should be removed but remain open to those who wish to use them.


## 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 a safe, sustainable and efficient logistics sector. 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 customers 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.

## Consultation response – General overview

This consultation response has been prepared following discussions with our membership across Great Britain and Northern Ireland.

Current regulations are creating unintended barriers to fleet electrification. Businesses require certainty for these significant future investments, and this is particularly pressing as 4.25 tonne electric vans are now entering the market in significant numbers and offer huge potential for logistics fleets. The industry remains supportive of the derogation the UK secured from the European Commission to increase the maximum weight limit for Category B licence holders to 4.25tn, allowing for cleaner, alternatively-fuelled van options that are often heavier than ICE vans due to the inclusion of the high voltage battery pack. Alignment of UK regulations between 3.5tn and 4.25tn battery electric vans would create a clear pathway for investment decisions and faster fleet electrification.

## Consultation response – terminology used

Logistics UK has noted that the consultation has different terms across the range of questions for the vehicles under consultation: zero emission vans, zero emission goods vehicles (ZEVGs). We have followed the terminology used in the individual questions in our responses, however we would wish to note that the sector also uses and understands the term zero-tailpipe emission vehicles. This is in recognition that while there are no greenhouse gas emissions from the tailpipe of battery electric or hydrogen fuel-cell vehicles, there are still lifecycle emissions embedded in both the manufacture of the vehicle and the energy sources needed to power the vehicle.

## Roadworthiness testing

## Questions for all respondents

- **Should 4.25t zero emission vans undergo class 7 MOT testing, (rather than HGV testing)? Please explain your answer**.

Yes, these vehicles are essentially a like-for-like replacement to their Internal Combustion Engine (ICE) equivalent, with the only fundamental difference being the extra powertrain weight.

Placing them into the Class 7 category will re-establish the status quo for industry, removing testing category confusion currently being experienced by both users (operators) and the maintenance providers (maintenance/MOT garage) for vehicles which essentially look the same.

For operators, this will ensure maintenance costs for these vehicles remain in line with their equivalent ICE vehicles, for example annual test fees:

- ICE van – £58.60 and required from the third year from registration.
- ZE van – £112.00 and required from the first year from registration.

It will also allow operators a greater choice of maintenance provision and MOT test facilities as they will be free to approach all MOT providers, rather than being limited only to DVSA authorised testing facilities (ATF).

- **Should 4.25t zero emission vans be MOT tested after 3 years from first registration (and then annually), rather than after one year from first registration (and then annually)? Please explain your answer**.

Yes, these vehicles are essentially a like for like replacement to their Internal Combustion Engine (ICE) equivalent, with the only fundamental difference being the extra powertrain weight.

It is important that the zero emission vehicles are treated the same for the frequency of roadworthiness testing as their ICE equivalent. This will ensure that the administrative cost of vehicle maintenance record-keeping remains similar to that of the ICE equivalent as demonstrated by the example MOT costs above. This is without having a negative impact on road safety as the ICE vehicles have almost identical operational cycles/use as the zero emission vehicles.

- **Would MOT testing 4.25t zero emission vans via a class 7 MOT have an effect on road safety? Please explain your answer**.

There should be little to no impact on road safety levels as their use and operation should be comparable to that of the ICE van they replaced, ICE vehicles have almost identical operational cycles/use as the zero emission vehicles. Responsible van fleet operators will always have a duty of care to ensure their vehicles are always kept in a roadworthy condition and this will not alter if the testing requirements were to be amended.

- **Would MOT testing 4.25t zero emission vans after 3 years from first registration (and then annually), rather than after one year (and then annually) have an effect on road safety? Please explain your answer**.

There should be little to no impact on road safety levels as their use and operation should be comparable to that of the ICE van they replace. ICE vehicles have almost identical operational cycles/use as the zero emission vehicles and the road safety impact would be expected to mirror that of the ICE vehicles.

- **Assuming that tachograph and speed limiter rules do not change, do you think that the Class 7 MOT test content should be changed to include the basic checks of these items (which are currently contained within the HGV test)?**

Logistics UK believes that the tachograph rules and speed limiter rules should be amended to remove these vehicles from mandated scope and the reasoning is set out below.

- **Are there other features that would be tested in an HGV test (such as sideguards) for which it would be important to update the Class 7 MOT if it included 4.25t zero emission vans (which all vehicles would be subject to)? Please explain your answer**.

We believe that there needs to be a wholescale review of vehicle categories, driver licencing, drivers' hours, etc (both in GB and Europe) to align with the aspiration of reducing emissions from road transport and the consequences this brings (slightly heavier vehicles). Logistics UK believes that the N1 classification should be moved up to 4.25t for zero emission vehicles and this would therefore mean there would be no need to fit and MOT test additional items, such as speed limiters.

- **Is HGV testing for 3.5t - 4.25t zero emission vans more burdensome than MOT testing for 3.5t ICE vans? Please explain your answer**.

Yes, as these vehicles must be submitted to DVSA for test, which adds to the costs, time and administration that accompanies such a test. For example, annual test fees are considerably more expensive for a zero emission vehicle, almost double the cost:

- ICE van – £58.60 and required from the third year from registration.
- Zero emission van – £112.00 and required from the first year from registration.

According to figures from the Society of Motor Manufacturers and Traders (SMMT) there are almost five million diesel powered vans operating on the UK's roads. If all things remain equal, the switch from diesel to zero tailpipe emission vehicles would cost industry an almost additional £300,000,000 in testing fees alone once all diesel vehicles have been taken off the road. This resource would have to be taken from elsewhere in company budgets that will stunt job creation, prevent investment in other technologies and would mean that operators would use their diesel vehicles for as long as possible and not switch to zero emission equivalents. The Department must take this, and other increasing costs, into consideration, especially since the 2024 Budget brought in increased employer National Insurance contributions that is estimated to have added an additional cost of around £1.2 billion extra to the logistics sector.

HGV testing requires the vehicle to be presented for test laden presenting extra challenges and burden over a Class 7 MOT.

The restriction of having to use DVSA ATFs means the choice is more limited and can be affected by waiting times to get a test. A Class 7 MOT test allows operators a greater choice of maintenance provision and MOT test facilities as they will be free to approach all MOT providers.

Having zero emission vehicles tested at a Class 7 MOT station is less burdensome, cheaper and more convenient.

- **Would moving 4.25t zero emission vans from HGV testing into scope of class 7 MOT testing reduce the burden on vehicle operators? Please explain your answer**.

Yes, for the reasons described in the answer above, the MOT costs would mirror that of the ICE vehicle it replaced.

MOT Testing a zero emission van as an HGV after year one instead of after year three costs more, as set out above. Additionally there is also the ATF lane service fee. All of these costs are subsequent increases in maintenance costs when compared to that of the ICE vehicle it is replacing, which is essentially the same vehicle, with the only fundamental difference being extra powertrain weight.

- **Would testing 4.25t zero emission vans after 3 years from first registration (and then annually), rather than after one year (and then annually) reduce the burden on vehicle operators? Please explain your answer**.

Yes, as the MOT costs would mirror that of the ICE vehicle it replaced – see previous comment.

## Drivers' hours and tachographs

## Questions for all respondents

- **What would be the benefits and risks of removing ZEGVs up to 4.25t from the scope of the assimilated drivers' hours rules (leaving them in scope of the GB rules)? Please explain your answer**.

Vehicle operators will gain several benefits from removing ZEGVs up to 4.25t from the scope of assimilated drivers' hours rules and leaving them in scope of the GB rules.

- Operators will be able to utilise ZEGVs on routes that take the vehicle outside the 62 mile from base exemption, and thus will increase the attractiveness of operators procuring these vehicles at fleet renewal.
- Operators would not be required to pay for training for the drivers to understand the complexity of the assimilated drivers' hours rules. Training would be via a DCPC course, so members estimate around £1500 per driver after everything is taken into consideration.
- Driving records for the hours worked in these vehicles would be able to be recorded in the logbook, and not via more expensive methods, such as the smart tachograph 2.

- Maintains attractiveness of driving for those holding a Cat B licence.
- ZEGVs would become a better business investment, with 21.2% of Logistics UK members stating that assimilated drivers' hours was a regulatory barrier to procuring these vehicles (Logistics UK van survey 2024)

- **Should ZEGVs up to 4.25t be removed from scope of the assimilated drivers' hours rules (leaving them in scope of the GB rules)? Please explain your answer**.

Yes, ZEGVs should be treated the same as vehicles up to 3.5t and should not be in scope of assimilated drivers' hours rules. Logistics UK members have told us that treating these vehicles equally compared to their ICE equivalent will make the case for procurement of ZEGVs much easier to make, and this in turn will lead to more zero tailpipe emission vehicles on the road.

- **What would be the benefits and risks of removing ZEGVs up to 4.25t from the scope of the assimilated tachograph rules (so they would not be required to use a tachograph)?**

It would mean that operators would be able to use ZEGVs over longer distance routes without the need for a costly retrofit of a tachograph into the vehicle. This requirement would cost a minimum of around £1,500-1,800 per vehicle for the installation of the device alone. There are other significant cost and time savings that would be accrued by removing this requirement and these relate to:

- the cost and time involved in drivers having to obtain a Drivers Card for the tachograph, £32 for the initial card and £19 per renewal/replacement.
- the maintenance of mandated calibration of the device, approximately £75 (+VAT) per vehicle unit (VU).
- Other administrative costs for the operator to manage card validity, downloading of driver card data, downloading of VU data, associated costs for the analysis of aforementioned data.

- **Should ZEGVs up to 4.25t be removed from scope of the assimilated tachograph rules (so they would not be required to use a tachograph)? Please explain your answer**.

Yes, ZEGVs up to 4.25t should be removed from scope of the assimilated tachograph rules to allow operators to gain from the benefits as listed above. In our van survey 2024, 19.2% of responses said that the tachograph rules were a regulatory barrier preventing them from procuring these vehicles.

## Speed limiters

## Question for all respondents

- **In your view, should the requirement for speed limiters to be fitted to 4.25t zero emission vans be removed? Please explain your answer**.

In keeping with Logistics UK's overall policy position of requesting a full review of the current regulatory thresholds so 4.25tns becomes the new 3.5tn threshold, we believe that zero emission vans up to 4.25tns should be treated the same as their ICE equivalent, as they are comparable to the vehicle they replaced and the rules on speed limiters should mirror this. This position should not be interpreted as preventing any vehicle operator for choosing to fit a limiter to their portion of van fleet above 3.5tns up to 4.25tns if they wish to have them.

- **In your view, what effect would removing the requirement for speed limiters for 4.25t zero emission vans have on road safety? Please explain your answer**.

A large portion of the zero emission van fleet is used on last mile, urban deliveries and therefore operate in areas with speed limits that are well below the maximum ability of a vehicle fitted with a speed limiter, for example 20 or 30mph zones in residential areas. The general operation of these vehicles will be similar to that of the ICE equivalent and therefore there should be little to no impact on road safety by removing the requirement from 4.25tn zero emission vans.

- **In your view, are requirements for speed limiters a significant barrier to adoption of 4.25t zero emission vans?**

The answer, in our view, to this question must be taken into consideration with the other regulatory barriers that add additional cost to the procurement and operation of zero emission vans up to 4.25tns, such as the requirement to install a tachograph and use assimilated drivers hours if operating the vehicle outside of the 67mile zone. Taken as a whole, all these additional costs are a significant barrier for operators to adopt these vehicles. Specifically for speed limiters, they are an additional cost only brought about by the necessity to transition to zero emission vehicles, which are heavier due to the battery, not the payload.

- **If yes, is the more significant barrier the initial fitting and maintenance of the speed limiter itself, the speed limit imposed or are they both significant?**

They are both a factor, one is a direct cost, the other a hidden cost although, as set out earlier, due to where the vehicles are used the speed limit will not be as much of a concern as the cost of installing and maintaining speed limiters. The costs for a speed limiter check is circa £60 plus 1 hours labour, which is circa £110 per hour.

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