Updating the minimum emission standard for new road vehicles

Your information

What is your full name?
Arthur Gribbin

What is your email address?
agribbin@logistics.org.uk

Are you responding on behalf of an organisation?
Yes

Organisation details

What is the full name of your organisation?
Logistics UK

How many people's view does your response represent?
11 to 50 people

You organisation type is:
another type of organisation: Logistics trade association

Implementation approach

Do you agree or disagree with the proposal to update the minimum emission standard in Great Britain to Euro 7 for new:

	Agree	Disagree	Don't know
light-duty vehicles	X		
heavy-duty vehicles	X		

If disagreeing explain why?
Logistics UK agrees in principle with updating the minimum emission standard to Euro 7 for light duty and heavy duty vehicles, provided implementation is realistic, cost effective and technically achievable for operators. Euro 7 introduces some positive elements, such as tighter controls on brake and tyre emissions and requirements around battery durability, which may contribute to longer term air quality and decarbonisation objectives.
However, the logistics sector is already operating under significant pressure, including high vehicle costs, constrained availability and the complex transition to zero emission technologies. Against that background, many members have raised concerns about whether the current technical direction of Euro 7 is proportionate. There is a strong view that the regulation places significant emphasis on further reductions in tailpipe NOx emissions at a point where emissions are already very low, while doing comparatively little to support transitional technologies or alternative fuels that could deliver broader system benefits. Manufacturers have also indicated that existing Euro 6 diesel engines are close to their technical limits, and that further reductions are likely to require more complex systems with limited additional environmental benefit. Our members are concerned that this approach risks increasing cost and complexity without delivering meaningful real-world air quality improvements. For these reasons, we support Euro 7 in principle, but only where costs, lead times and supply chain readiness have been fully assessed and the regulation is applied proportionately.

Do you agree or disagree with the proposed implementation approach to maximise the approval routes available to demonstrate test compliance with the Euro 7 standard?

Agree

Additional suggestions

What, if any, other implementation suggestions do you want to be considered in the proposed implementation approach?

To support effective implementation, we believe government should undertake a formal assessment of the likely impact of Euro 7 on vehicle cost and availability, particularly for heavy duty vehicles with long production and replacement cycles. This will be essential for operators planning fleet renewal.
Transitional flexibility will also be important for specialist and vocational vehicles, many of which rely on multi-stage builds and have longer lead times than standard models. Early and sustained engagement with component suppliers, converters and SME bodybuilders will help identify risks and prevent bottlenecks.
Clear communication will also be required on how requirements relating to plug in hybrids, brake wear and tyre emissions will be reflected in taxation, enforcement and compliance regimes. Operators need certainty to make long term investment decisions.

What, if any, challenges do you foresee arising from the proposed implementation approach to implementing Euro 7 standards in Great Britain (supplying evidence if possible)?

Members anticipate a few challenges. First, there is a real risk to vehicle availability, particularly for heavy duty vehicles, as the EU legislation is still evolving and manufacturers are increasingly prioritising investment in zero emission technologies. Any misalignment or early implementation in Great Britain could disrupt supply.
Second, Euro 7 is expected to increase vehicle and component costs due to the introduction of additional systems such as on-board monitoring, battery durability requirements and tighter brake and tyre limits. These costs will ultimately fall on operators.
Third, the increased technical complexity of vehicles is likely to raise maintenance and compliance costs. New monitoring and diagnostic systems will require additional equipment, training and downtime.
There is also uncertainty for multistage approvals, where clarity is needed early to avoid delays for bodybuilders and converters.
More broadly, members have expressed concern that a strong regulatory focus on further tailpipe reductions may lead to unintended air quality outcomes. Significantly tighter NOx limits are expected to require more complex aftertreatment systems, increasing material use, AdBlue consumption and operational risk. Increased dependence on AdBlue also exposes operators to input cost volatility, as recent global supply pressures have shown, creating an additional and uncertain cost burden for fleets.
From an already low baseline, members question whether the incremental emissions benefit justifies this added complexity, particularly when weighed against cost, durability and system wide impacts. There are also concerns that niche and emerging powertrains, such as hydrogen combustion engines, may face challenges not fully reflected in current test methods.

Implementation dates

Do you agree or disagree with all the proposed implementation dates?

Agree

In-service conformity (ISC)

Do you agree or disagree with the proposed changes to ISC testing obligations?

Agree

ISC testing: factors to consider

Which factors, if any, do you think should be considered:

to determine the minimum overall annual volume of ISC testing in Great Britain	When setting testing volumes, government should consider the size and diversity of manufacturer fleets operating in Great Britain, recognising that larger or more complex portfolios may justify higher sampling rates. Historical compliance performance should also be considered, with lower risk manufacturers subject to fewer tests. Real world emissions risks associated with technologies, as well as the practical capacity of the Vehicle Certification Agency and its supply chain, must also be factored in to ensure expectations are realistic and deliverable
within the risk-based assessment to prioritise ISC testing in Great Britain	A risk-based approach should prioritise vehicle families that have not been tested by any EU authority, as well as powertrains with more complex emissions control systems. Previous compliance issues or recalls should influence prioritisation, alongside new and emerging technologies introduced under Euro 7, including battery durability monitoring systems. Market share and total UK parc size should also be considered, so that high volume vehicles receive appropriate oversight relative to their real world impact.

Final comments

Any other comments?

Logistics UK welcomes the opportunity to respond to this consultation. We support policies that improve air quality and enable the transition to zero emission logistics, but these must be delivered in a way that maintains vehicle availability, avoids disproportionate costs for operators, supports SME converters and bodybuilders, and ensures regulatory alignment across Great Britain, Northern Ireland and the EU.
More broadly, members report declining confidence in the long term regulatory treatment of internal combustion assets. While Euro 7 requires significant investment to comply, wider policy signals increasingly point to a limited future for combustion technologies. This creates uncertainty over asset life, residual values and the long term acceptability of Euro 7 compliant vehicles, raising concerns about premature obsolescence.
Without clearer alignment between emissions regulation and future powertrain strategy, there is a risk that regulation undermines investment confidence without delivering proportionate environmental benefit. The logistics sector remains committed to cleaner and more sustainable operations, but needs clarity, stability and realistic timelines to plan effectively.

Summary
• Logistics UK supports updating to Euro 7, provided it is introduced in a realistic, proportionate and cost-effective way that does not harm vehicle availability or place excessive costs on operators.
• Alignment with EU and UNECE approvals is welcome, as it avoids divergence, reduces red tape and helps keep the UK market supplied with suitable vehicles.
• While the approach is broadly sensible, government should assess impacts on vehicle costs, supply chains, specialist vehicles and bodybuilders, and ensure clear guidance for operators.
• Proposed EU aligned dates are reasonable if the UK mirrors any future EU delays, especially for heavy duty vehicles where legislation is still evolving.
• The move to a risk based in service conformity (ISC) testing system is practical and proportionate, given the increased workload facing the VCA under GB only approvals.
• Factors such as fleet size, known emissions risks, market share and previous compliance performance should guide how ISC testing is prioritised and scaled.
• Overall, Logistics UK supports the aims of cleaner air and better long-term regulatory alignment, but stresses the need for pragmatic timelines, supply chain readiness, and clear communication so operators can plan fleet investments with confidence.