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The National Caravan Council (NCC) is the trade association representing the touring caravan, motor caravan, holiday caravan and related industries in the UK. For the purposes of this response, we have consulted our manufacturer members producing motor caravans, both in the UK and in Europe, (in excess of 25 companies) and all of whom will be affected by the introduction of a zero-emission vehicle (ZEV) mandate and CO<sub>2</sub> emissions regulation for new cars and vans in the UK.

We welcome the opportunity to respond to this consultation.

#### **Question 1:**

**(a) Do you agree or disagree with the UK Government's preference to introduce a UK-wide regulatory framework?**

**(b) Or do you agree or disagree with the introduction of different trading schemes with separate requirements in one or more of the nations, different from the rest of the UK?  
Please explain your answer.**

The NCC agrees with the preference set out in (a) to introduce a UK-wide regulatory framework which in our view would provide the necessary consistency and keep administration and related costs to a minimum.

#### **Question 2**

**(a) Do you agree or disagree with the UK Government's preference to introduce UK-wide annual targets?**

**(b) Or do you agree or disagree with year-on-year targets having to be met within each nation of the UK annually?  
Please explain your answer.**

The NCC agrees with the preference set out in (a) to introduce UK-wide annual targets in line with the UK-wide regulatory framework.

**Question 3:**

**Do you agree or disagree with the proposal for the central trajectory for new zero emission cars set out in Table 1?**

The NCC agrees with the central trajectory set out in Table 1.

**Question 4:**

**Do you agree or disagree with the proposal for the central trajectory for new zero emission vans set out in Table 2?**

The NCC agrees with the central trajectory set out in Table 2.

**Question 5:**

**Do you agree or disagree that the proposed derogations (thresholds and adapted trajectories) strike an appropriate balance between supporting small volume manufacturers while also ensuring that all manufacturers play a part in the transition to ZEVs?**

The NCC agrees that the proposed derogations strike an appropriate balance as set out.

**Question 6:**

**Do you agree or disagree with these proposals for the inclusion or exclusion of SPVs? If you disagree, please state your reasons for specific SPV categories.**

The NCC agrees that SPVs should be exempt from the ZEV mandate because there is currently an insufficient number of ZEVs available to convert into SPVs.

**Question 7:**

**Do you agree or disagree with the proposals for banking during the 2024-2030 period?**

The NCC agrees with the proposals for banking during the 6-year period.

**Question 8:**

**Do you agree with the proposed provisions for borrowing in the 2024–2026 period? If you disagree with the proposal, please provide alternative options and your rationale.**

The NCC agrees with the proposed provisions for borrowing in the 2-year period.

**Question 9:**

**What are your views on the proposed minimum requirements for ZEVs (emissions, minimum range and warranty)?**

N/a

**Question 10:**

**Are there additional minimum requirements that should be added to the regulation (in the first year or at a later point)? Please provide your rationale.**

N/a

**Question 11:**

**Do you agree or disagree with the proposal to provide additional credits to ZEVs used in car clubs? Are there any additional criteria or provisions that can increase the effectiveness of these incentives? Please explain your reasoning.**

The NCC is broadly in agreement with the proposal as drafted for those vehicles where such an initiative is an acceptable and workable solution to transport needs.

**Question 12:**

**Is the proposed incentive mechanism an appropriate and beneficial way to support the development of zero emission WAVs?**

N/a

**Question 13:**

**What are your views on the proposed payment levels in the ZEV mandate?**

The NCC understands that the proposed payment levels reflect the arrangements for Europe.

**Question 14:**

**What are your views on the proposed methodology to set baseline CO2 emissions targets for manufacturers?**

The NCC accepts the proposal as set out based on 2021 figures given that the emissions targets need to start somewhere.

**Question 15:**

**Do you support the flat scenario, the tightening scenario, the lightweighting scenario or a different trajectory for the CO2 standard? Please explain your reasoning.**

We are unable to comment as this lies outside our current technical expertise.

**Question 16:**

**Does the proposal for derogations under the non-ZEV CO2 standard strike an appropriate balance between supporting small volume manufacturers and minimising increases in emissions from combustion engine vehicles?**

The NCC accepts this sets the appropriate balance for those involved.

**Question 17:**

**What are your views on the proposed categories for exemptions from the non-ZEV CO2 standard?**

The NCC welcomes the decision to exempt some categories of SPVs from the non-ZEV CO2 which includes motor caravans.

**Question 18:**

**Do you agree or disagree with the proposal for how pooling would operate under the ZEV mandate and non-ZEV CO2 standard?**

N/a

**Question 19:**

**What are your views on the proposed method for setting non-ZEV CO2 targets for new manufacturers entering the UK market?**

The NCC agrees with the proposals as set out for new manufacturers. However, consideration should be given to such businesses who do not have production figures from the baseline of 2021.

**Question 20:**

**What are your views on this proposed mechanism to enable overcompliance with the ZEV mandate to help toward compliance with the non-ZEV CO2 regulation?**

The NCC agrees with the proposed mechanism which appears to offer an appropriate level of flexibility for those who are in a position to exceed compliance with the ZEV mandate.

**Question 21:**

**What are your views on this proposed mechanism to enable overcompliance with the non-ZEV CO2 standard to help toward compliance with the ZEV mandate targets?**

The NCC agrees with the proposed mechanism which appears to offer an appropriate level of flexibility for those who are able to exceed compliance in one area ahead of the other mandate targets.

**Question 22:**

**What are your views on the levels and structure of the proposed payment system for the non-ZEV CO2 regulation?**

The NCC agrees with the proposed structure which appears to offer an appropriate level of flexibility.

**Question 23:**

**What are your views on the proposed timeline and process for reporting data and meeting compliance with the ZEV mandate and non-ZEV CO2 scheme?**

The NCC believes the timescales are somewhat ambitious, but is mindful of the commitments to reduce GHG, decarbonising transport and transitioning to ZEV in line with global objectives. The process for reporting data and meeting the relevant compliances appears proportionate given the overall timelines.

**Question 24:**

**Do you support or oppose the proposal to keep the regulation under review?**

The NCC accepts that regulations should be subject to review and that a review should be conducted using recognised mechanisms. However, we have concerns with the proposal that a future review may change the categories of SPVs that currently lie out of scope. The impact of such a proposal on our industry would be significant and will need to be fully assessed and costed with a proportionate transition period applied if adopted.

**Question 25:**

**What are your views on the potential impact of the two proposed schemes on communities in the more rural and remote parts of the UK and to those businesses involved in the sale of vehicles in those areas?**

The NCC is concerned with the current lack of infrastructure to support ZEVs across the UK, and in particular the impact on rural communities, and leisure and tourism businesses in rural and remote parts of the UK.

Urgent and coordinated work is required to ensure that these areas, communities and businesses involved in the supply are not at an undue disadvantage.

**Additional comment**

The NCC welcomes the exclusion of some categories of SPVs from the current non-ZEV CO2 standard and specifically motor caravans. We believe that any future application of the standard for multi-stage vehicles should be based on whether the emissions approval has been changed rather than a change to the full type-approval for the vehicle as outlined in the recent series of workshops delivered by representatives from the Department for Transport.

Thank you for the opportunity to respond to this consultation.  
If you have any queries or require further information, please email [policy@thencc.org.uk](mailto:policy@thencc.org.uk).