



To the Citizens' Assembly on Climate Change

Jersey Motor Trade Federation – Climate Change, Sustainable Transport Policy and Carbon Neutral Plan

Where is the Motor Vehicle Industry heading naturally with minimal GOJ intervention?

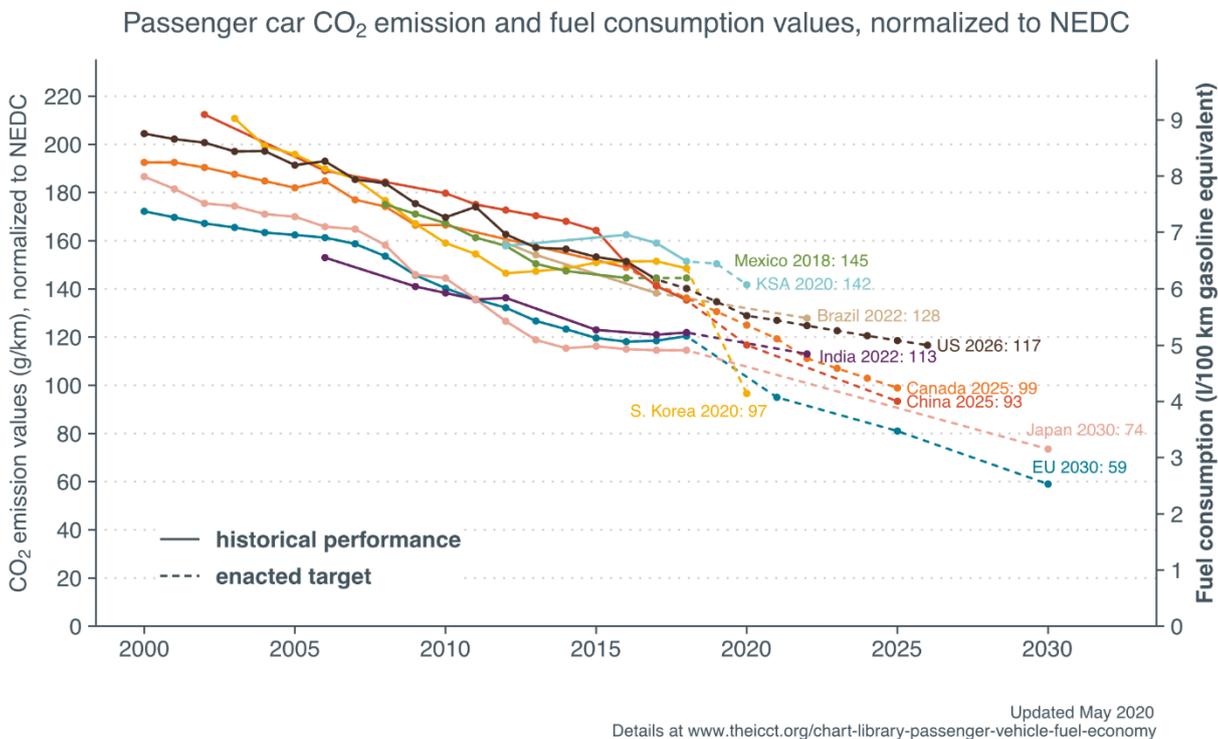
CAFÉ (Clean Air for Europe)

The CAFE programme was established to support the European Commission's development of the Thematic Strategy on air pollution, the Directive on Ambient Air Quality and Cleaner Air for Europe and its Impact Assessment.

On 17 April 2019, the European Parliament and the Council adopted [Regulation \(EU\) 2019/631](#) setting CO₂ emission performance standards for new passenger cars and for new vans in the EU. This Regulation started applying on 1 January 2020, replacing and repealing Regulations [\(EC\) 443/2009](#) (cars) and [\(EU\) 510/2011](#) (vans).

To achieve a climate-neutral EU by 2050 and the intermediate target of an at least 55% net reduction in greenhouse gas emissions by 2030.

The current Regulation includes targets for 2020, as well as targets that apply from 2025 and 2030.



The above slide shows that Europe has the most stringent CO₂ targets in the world and by 2030 the average CO₂ of all new cars sold will be under 60g/km CO₂, well below the ULEV target of 75g.

Follow the UK

The UK Government is planning to ban the sale of petrol and diesel cars by 2030 with vehicles that can complete at least part of their journey with zero emissions, such as hybrid or plug-in cars still allowed to be sold until 2035. As all local franchises are aligned to the UK imported it makes sense to follow the same path for local car retailers.

PTi (Periodic Technical Inspection)

The GOJ is planning to introduce PTi testing in 2023 on all Cars and light vans over 5 years old, it is estimated this will result in between 5 and 10% of the total vehicle parc being removed from the road as being uneconomical to repair. These will be the older and generally higher polluting vehicles. The remaining vehicles will need to pass the strict emissions test ensuring that all vehicles are running at their optimum efficiency improving emissions and air quality.

Carbon Neutral Synthetic Fuels

Carbon-neutral synthetic fuels can be manufactured in two ways. The first is using captured carbon dioxide or carbon monoxide from the atmosphere or an industrial process such as steel making and synthesising it with hydrogen obtained from water via electrolysis. These are called efuels. The second category is synthetic biofuels, and these are created from biomass (such as waste from forestry) that is gasified before being catalysed with hydrogen using chemical or thermal processes.

There are many benefits and advantages to these sustainable synthetic fuels. They can directly replace their fossil fuel equivalents or 'drop in', because their volume and energy density are very similar. This means they will work with current petrol and diesel engine technology and can use the established fuel infrastructure for storage and distribution. They are also cleaner than fossil fuel equivalents, creating fewer particulates and nitrogen oxides. We must ensure that any Palm oil used is sustainably grown.

While the cost of efuel makes it currently prohibitive, the cost of synthetic biofuels is approximately 50p per litre higher than its fossil fuel equivalent. The Impot Duty levied on all road fuel is also approximately 50p, if the GOJ allowed the importation of synthetic biofuel Impot free the price to the end user could be equivalent to the fossil fuel.

The JMTF is pleased to hear that the GOJ is trialling the use of RD100 Biofuel diesel in their fleet and we await the results with interest. We understand somewhat surprisingly that Liberty Bus were offered RD100 to trial but were not interested. We also understand there is a substantial quantity of RD100 already on Island.

Home Working

In 2020 many businesses successfully adapted to operating on a work from home basis and the effect on traffic levels has been considerable. If businesses adopted a work from home approach at a level of 50% of staff the traffic congestion would disappear, and the air pollution will dramatically fall. The Jersey Finance Industry alone employs over 13,000 people. Perhaps a Private Parking space levy would incentivise work from home.

With all the above the Island can achieve great strides towards its current targets without enforcing any major changes or policies.

GOJ Assistance to speed up Electrification

If the GOJ is serious about promoting a switch towards electrified vehicles it must follow the example set by many Governments across the World and introduce incentives to change. An EV is averagely 30% more expensive to produce than its ICE (Internal Combustion Engine) equivalent. Both the Dealers and Manufacturers are selling EV vehicles on much smaller margins. Locally, as a trade we have already invested substantial amounts of money in training, tooling and charging systems in order to facilitate the increase in EV sales. The GOJ should now do likewise.

The UK has pledged to invest £1.3 Billion in the charging infrastructure as well as subsidies to install chargers at homes and offices. They have committed to continue their grant which will pay for 35% of the purchase price for these vehicles, up to a maximum of £3,000.

In June 2020 Germany increased their grant to 6,000 euros to the customer and an additional 3,000 euros to the OEM. France increased their subsidy to 7,000 euros.

The GOJ needs to do more than offer 1 year's free parking by giving grants for the purchase of EV's and for the installation of charging points.

Other Points raised by the Jersey Motor Trade Federation for consideration.

The JMFT met with the Minister for Infrastructure on 28th February 2020 and we were promised further consultation, but none has taken place and a reminder letter to the Minister of 14 December remains unanswered.

The Motor Trade employs more than 600 people and we must be careful not to jeopardise the livelihood of these people. Figures from FOI, 21st December 2020.

The fundamental principles of the STP remain very similar to those produced back in 2003 and much as it is clear to see the advantages achieved by walking and cycling and to a lesser degree bus usage, we must understand that no matter how high our aspirations for change, it is a monumental mountain to climb to achieve this change in habit. After reading the comments from the October 2019 STP Survey, much of the feedback from cyclists and walkers was that they cycle or walk on a weather permitting basis. Most daily cyclists will agree that the amount of people cycling during the winter drops off considerably compared to the summer. Unfortunately, this is unlikely to change.

VED – Although introduced under the guise of encouraging people to buy more efficient, less polluting vehicles it does in fact penalise the person changing to a more fuel-efficient car while the person retaining their older more polluting vehicles pay nothing. Should VED be scraped and replaced with a fairer user pays approach?

The finance industry is responsible for a large volume of commuter traffic / emissions, many of these companies already benefit from reduced tax structure, should they not be targeted with parking levies or some other form of financial burden?

Data correctness – The JMFT questions the figures used with regards number of vehicles on the Island, as agreed the DVS does not have an accurate database as data on vehicle scrappage was not collected for many years. Many of the figures do not consider the historic registration of hire cars used by manufacturers to bolster their registrations and most of these vehicles were subsequently shipped off Island. We also question the average mileage figure of 9656 km per annum used by Oxera. In Jersey, many people own multiple vehicles, the majority of which are in storage and are seldom on the road. The true number of vehicles on the road will only become apparent when PTI's (MOT) are introduced in a few years' time. Many figures are taken from the 2010 STP, Air Quality figures taken from 2013, data from 2011 Census, surely, we have access to more up to date figures and data.

Page 14 of the STP states "The detailed plans for decarbonising transport will be agreed following the recommendations of the proposed citizens' assembly on climate change and, at that stage, integrated delivery plans will be brought together across both areas of work" STP and Carbon Neutral. Although the Sustainable Transport Strong Start Delivery Plan 2020 States that "By Autumn 2020 we will have a plan agreed for the phasing out of petrol and diesel cars to align with the ambition of the Carbon Neutral Strategy" This plan is listed in the STP update as a project substantially delayed or paused. Hopefully the JMFT will be consulted prior to the release of the plan!