Dear Madam/Sir,

The IET’s response to the ‘Regulating CO2 emission standards for new cars and vans after transition’ consultation.

The Institution of Engineering and Technology (IET) is Europe's largest professional engineering and technology organisation with 168,000 members drawn from industry, academia and the public sector. IET members represent a wide range of expertise, from technical experts to business leaders, encompassing a wealth of professional experience and knowledge. Our primary aims are:

- to provide a global knowledge network, promoting the exchange of ideas between business, academia, governments and professional bodies, and enhancing the positive role of science, engineering and technology
- to address challenges that face society in the future.

The IET supports the government's direction in this area and urges it to continue in this way. We would be happy to discuss our response in more detail and provide examples and evidence from our extensive networks of engineering employers and academic partners. Please feel free to contact us to arrange this.

**Question 1:** Do you have any comments on the approaches proposed for UK targets and CO2 emission formulae? Are there unintended consequences of the proposed approach? If not, please explain your reasons in your response.

**Emissions**

The IET welcomes the UK’s emissions targets to reduce CO2 emissions and combat climate change. We also recognise that transport is the largest contributor to CO2 in the UK.

The IET’s expert panel raises concern over the timing and necessity of the regulation. We recommend not diverging from the EU average in time, as this could result in additional regulation and bureaucracy, and have a negative impact in international trade.

**Unintended Consequences**

If regulations are different in the UK and Europe, UK vehicle development risks becoming a backwater as a result of having a different landscape to the rest of the continent. Long term benefits can result from a single, level standards playing field across Europe, ensuring the UK vehicle R&D pathway remains the same as the rest of Europe.

A change in the CO2 emissions criteria could lead to confusion and difficulty when it comes to hybrid vehicles. We note the different environmental performance of Series-Hybrid and Parallel-Hybrid vehicles and recommend that further consideration be given to technical and policy issues concerning these two technologies.

**Question 2:** Do you have any comments on the approach proposed for sales volumes and derogation thresholds? Are there unintended consequences of the proposed approach? If not, please explain your reasons in your response.

We do not have any comments.
Question 3: Do you have any comments on the approach proposed for eco-innovations? Are there unintended consequences of the proposed approach? If not, please explain your reasons in your response.

As stated previously, long term benefits can result from a single, level standards playing field across Europe, ensuring the UK vehicle R&D pathway remains the same as the rest of Europe.

Question 4: Do you have any comments on the approach proposed for super-credits? Are there unintended consequences of the proposed approach? If not, please explain your reasons in your response.

It seems tax credits will dominate, as part of the regulation on this will be a major contention point for industry, which might lead to politicisation, bending of rules and loss of public confidence. It must be transparent and encompass the business lifecycle, not the vehicle lifecycle.

Question 5: Do you have any comments on the minor and technical changes proposed? Are there unintended consequences of the proposed approach? If not, please explain your reasons in your response.

There does not seem to be much impact and WLTP (Worldwide Harmonised Light Vehicles Test Procedure) will remove any conflicts. However, the IET believes legislation can be used to gradually reduce emissions and the polluting effect of vehicles. Much more effective towards ‘net zero’, would be to use ‘Whole Life Cycle Analysis’ to make reductions on environmental impact holistically.