



Policy Paper
“Intelligent Phasing” for freight
in Clean Air Zones

Road Haulage Association

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Intelligent Phasing for freight in Clean Air Zones

1. The RHA is urging caution in applying widespread Clean Air Zones to Heavy Goods Vehicles (**HGVs**) in the UK. The RHA’s concern is based on the very limited impact some area-wide measures will have on improving health and local air quality, and the high cost that will be incurred as a result of poorly thought through measures.
2. Air quality is already improving. However, the RHA recognises that there is a need to deal with local air quality issues that impact on people’s health.
3. If poorly executed, Clean Air Zones will add significant costs to local businesses and consumers, will put some businesses in financial peril and may not materially improve health or local air quality. In our original policy paper ([available here](#)) we suggest a phasing that would exempt Euro IV and V lorries from charging for a few years.
4. Having considered the development of early Clean Air Zones proposals put forward more recently, and the lack of a retrofit option for lorries, the RHA would like to highlight an alternative approach to the Euro VI only approach that has been adopted so far.

The Clean Air Zone challenge – too few Euro VI lorries

5. In the early years of new Clean Air Zones there will not be sufficient Euro VI lorries to meet the demand for freight services. Use of non-Euro VI lorries will be substantial and inevitable. Table 1 below shows the fleet make up on selected dates between 2016 and 2024.

Table 1. Market Share Lorries by Euro class over time¹

	Euro VI	Euro V	Euro IV	Pre Euro IV
end 2016	26.6%	31.8%	16.6%	25.0%
end 2018	43.7%	26.3%	12.4%	17.6%
end 2020	54.2%	24.9%	8.1%	12.8%
end 2022	64.8%	20.3%	5.3%	9.6%
end 2024	75.4%	14.0%	3.7%	6.9%

¹ Based on Department for Transport table veh0511 - 2016 figures extrapolated forward to 2024

- At the end of 2020 45% of lorries will fall in scope of Clean Air Zone charging if a Euro VI only approach is adopted. As non Euro VI lorries will have to be used in substantial numbers the Clean Air Zone charges will in effect be a tax on many freight movements, a tax that will impact most severely on smaller and medium sized businesses.

Proposal for Intelligent Phasing

- If there was a viable retrofit option for lorries that would allow them to be upgraded to a recognised Euro VI standard might able to be handled by the sector. However, there is no retrofit option available.
- The RHA proposal is that radically lower Clean Air Zone charges should be applied to Euro V lorries initially and charges then increase as the proportion of Euro VI vehicles in the lorry fleet increases between 2020 and 2024. Table 2 suggests an approach that could be taken.

Table 2. RHA Suggested Intelligent Phasing

	Euro V	Euro IV & Earlier
2020	£10	£100
2022	£30	£100
2024	£100	£100

- This approach will make it much cheaper and quicker to remove higher emitting Euro IV and earlier lorries from Clean Air Zone areas.
- Table 3 shows the European emission standards that apply to lorries. Ultra Low Emissions Zone compliant Euro VI lorries are clearly the best. However, the table also highlights the improvements achieved over time through the various emission standards that show substantial improvements achieved by Euro V over earlier iterations.

Table 3. Summary of HGV NOX Euro Standards

		NOX standard*
Euro VI	2014 on	0.4
Euro V	2009 to 2013	2.0
Euro IV	2006 to 2008	3.5
Euro III	2001 to 2005	5.0
Euro II	1997 to 2000	7.0
Euro I	1996 + older	8.0

*Nox emissions based on Maximim permitted for vehicle type
This is a summary of the NOx standards only.

