

About MPA

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. With the affiliation of British Precast, the British Association of Reinforcement (BAR), Eurobitume, MPA Northern Ireland, MPA Scotland and the British Calcium Carbonate Federation, it has a growing membership of 530 companies and is the sectoral voice for mineral products. MPA membership is made up of the vast majority of independent SME quarrying companies throughout the UK, as well as the 9 major international and global companies. It covers 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 70% of ready-mixed concrete and precast concrete production. In 2018, the industry supplied £16 billion worth of materials and services and was the largest supplier to the construction industry, which had annual output valued at £172 billion. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors.

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Question 1 Do you agree or disagree that introducing a phase out date for the sale of new nonzero emission HGVs will help us meet our legally binding net zero target? Please explain your answer.

Agree; the market is moving that way and any incentive to manufacturers is helpful to bring suitable vehicles to market. This must be a realistic date, based on vehicle and infrastructure developments, which requires some degree of flexibility - if for example suitable vehicles are not available at the heaviest end of the market or the charging/refuelling infrastructure is under-developed by 2040, it would be unreasonable not to push back a little in allowing an extension to the proposed date. Likewise, it could be sensible to bring forward the date if zero emission HGVs are widely available with suitable infrastructure earlier than currently anticipated. The phaseout date for cars was brought forward in 2020, giving a decade's notice at a time when electric cars were already becoming more common on the streets, so any decision to bring forward the date must be made with adequate notice, reflecting investment cycles to minimise the risk of stranded assets.

MPA members are clear that they are keen to eliminate greenhouse gas emissions from their operations¹, and that once the vehicles capable of the range, payload and charging/fuelling times are in the market at suitable prices, and the necessary infrastructure is deployed, there is no rationale for sticking with diesel. Our members'

¹ UK Concrete (2020) "UK Concrete and Cement Industry Roadmap to Beyond Net Zero"
https://www.thisisukconcrete.co.uk/TIC/media/root/Perspectives/MPA-UKC-Roadmap-to-Beyond-Net-Zero_October-2020.pdf

track record on meeting the Euro VI requirements for low emission zones, or the Direct Vision Standard in London, demonstrates that we can and do meet such changes in good time where there is adequate notice, policy is developed in dialogue with industry, and the technology is available. Switching over to zero emission vehicles is a bigger challenge on a longer timeframe but as long as the infrastructure and vehicles are available it is achievable through the normal fleet renewal cycle.

A phaseout date on sales is preferable to one on use, since the cascade of vehicles through first owners and on into the second-hand market is an important part of fleet management and is important for SMEs. A phase out of use will need to be managed further into the future, with the residual value and second hand market important considerations. It would be worth considering a scrappage scheme to support businesses transition once zero emission vehicles are readily available.

Question 2 Do you agree or disagree with our approach to split the phase out dates for new non-zero emission HGVs into two weight categories? Please explain your answer.

Yes, provided vehicles are available and necessary infrastructure deployed; it is likely that suitable zero emission vehicles capable of replacing existing vehicles under 26 tonnes will be available before those over 26 tonnes so at this stage, it makes sense to split the weight categories.

Question 3 Do you agree or disagree that 26 tonnes and under, and more than 26 tonnes are the right categories? What evidence do you have for or against?

No answer.

Question 4 Do you agree or disagree with our proposal to end the sale of new non-zero emission HGVs, for vehicles weighing from 3.5 up to and including 26 tonnes, by 2035? What evidence do you have for or against?

Agree, with the proviso that suitable vehicles must be affordable and available in the market and the charging/refuelling infrastructure must be deployed in good time. Consideration should also be given to supporting the second hand market, especially the impact on SMEs.

Question 5 What do you consider the main challenges and barriers to meeting this target for HGVs 26 tonnes and under?

Vehicle availability and performance together with the infrastructure needed to charge or refuel vehicles need to be established before businesses can have sufficient confidence to switch their fleet replenishment cycle to zero emission vehicles. The phaseout date is a useful tool to pressure manufacturers to deliver the vehicles to the market in good time, but the rollout of charging/refuelling infrastructure is a significant challenge that must be tackled to enable available vehicles to be used reliably. This is a potential market failure that would benefit from Government playing a co-ordinating role.

There are different issues depending on which technology ends up being the preferred choice. Electric HGVs would likely require very substantial investment in generating capacity and the electricity distribution grid, on top of that needed to electrify cars, vans, and heating. Assuming dispersed charging, for instance vehicles charged overnight at a concrete plant or quarry, the level of reinforcement of the grid needed will be very substantial because many of these sites are remote and therefore often unelectrified beyond the provision of basic welfare facilities - sometimes powered by generators. This could be a significant cost. How that cost is fairly and equitably distributed across all consumers is a significant potential political hurdle.

For hydrogen, a whole new network will be needed, in place of current filling stations for petrol and diesel. Ensuring the adequate supply of hydrogen and prioritising it appropriately to those applications that cannot be electrified are essential roles for Government. The Hydrogen Strategy notes that

“It is suited to use in a number of sectors where electrification is not feasible or is too costly, and other decarbonisation options are limited. This may include generation of high temperature heat, as in industrial furnaces, and long-distance and heavy-duty transport.”²

Businesses would need confidence that adequate supply will be available to them to invest.

Question 6 How can these barriers be addressed?

Vehicle availability is in the hands of the manufacturers, but they seem to be developing products in good time as noted by the consultation document. Most HGVs in the UK are imported from the EU, so the technology changes will be heavily influenced by European standards.

For electric charging, the issue is part of the overall shift to net zero, of reinforcing the grid and ensuring enough generation capacity. UK industry already pays among the highest electricity prices in Europe, with network charges a significant factor, so ensuring that grid upgrades are done in an efficient way and paid for fairly by all consumers is vital for competitiveness. Distribution Network Operator charges for infrastructure could be a significant barrier, especially at remote sites. Ofgem has a role to play in ensuring a fair distribution of these costs.

For hydrogen, delivering adequate supply at an appropriate price through a comprehensive network by the time the vehicles are in place is essential. The Hydrogen Strategy estimates transport use at 20-45 TWh by 2035³, out of a total demand of 55-165TWh, but as hydrogen may be the only solution for heavier vehicles, they should be prioritised for supply over applications which can be electrified.

² BEIs (2021) Hydrogen Strategy p9

³ Ibid, p51

Question 7 Do you agree or disagree with our proposal to end the sale of new non-zero emission HGVs, for vehicles weighing more than 26 tonnes, by 2040? What evidence do you have for or against?

As Q4.

Question 8 What do you consider the main challenges and barriers to meeting this target for HGVs weighing more than 26 tonnes?

As Q5.

Question 9 How can these barriers be addressed?

As Q6.

Question 10 Do you agree or disagree that these phase out dates should be extended to all nonzero emission HGVs, including those using low carbon fuels, in their respective weight categories? Please explain your answer.

Agree. Once zero emission vehicles capable of meeting our members' operational needs are readily available there is little reason to buy vehicles that use low-carbon fuels, especially if these emit NOx or particulate matter.

Question 11 Do you agree or disagree that maximum permissible weights for certain zero emission vehicles (mainly HGVs) on both international and domestic journeys should increase by up to 2 tonnes (without exceeding 44 tonnes)? Please explain your answer.

Question 12 Do you agree or disagree that weight limits should increase by up to a maximum of 1 tonne for certain alternatively fuelled HGVs on both international and domestic journeys (without exceeding 44 tonnes)? Please explain your answer.

Question 13 Do you agree or disagree that weight limit increases should only offset any additional weight due to the alternatively fuelled or zero emissions technology? Please explain your answer.

Any reduction in the payload of a vehicle leads to increased journeys, less efficient operation and more congestion so should be avoided. Weight limits should reflect the increased weight of vehicles across all categories due to batteries or fuel cells. These should be increased by the average additional weight, to retain the standard loads vehicles are able to deliver, subject to safety testing and within the 44 tonne limit within which bridges and other structures are designed.