



FPH Transport SIG Consultation Response

Phasing out the sale of new petrol and diesel cars from 2030 and Support for the Zero Emission Transition (February 2025)

Access the [Government's publication here](#).

1. Are you responding as an individual or an organisation?

This response is submitted on behalf of the UK [Faculty of Public Health \(FPH\)](#), as developed by the [Transport Special Interest Group](#). The FPH, as part of the medical Royal College arrangements, is the standard-setting body for public health in the UK and professional home for over 5,000 members of the public health workforce. We advocate on key public health issues and have a strong mandate and responsibility to ensure that the essential functions, standards and resources of a robust public health system are maintained. Our role is to improve the health and wellbeing of local communities and national populations. We do this by supporting the training and development of the public health workforce and improving public health policy and practice in partnership with local and national governments in the UK and globally.

Although we agree with phasing out ICE vehicles as quickly as possible, we are concerned that the focus on a shift to EVs will not reduce harms to sustainability, health and equity from our current transport system. We recognise the importance of the automotive industry, but there is still a lot of embedded carbon in EVs, and they still cause air pollution through tyre- and brake-wear, alongside all the other harms of car use and car dependence. Encouraging sales of EVs on its own will benefit the car industry, which needs people to repeatedly buy new cars, but increase costs to people with no alternatives if we do not invest in other modes. We need to think much more progressively not just about moving to EVs but also transitioning away from car dependence so that everyone has access to more sustainable alternatives. We should be encouraging growth of good jobs in public transport and in supporting active travel instead of any growth in manufacture of cars. Research suggests that the negative health consequences of electric cars are likely to be similar to ICE cars,



and that even in rural areas it may be better to invest in public transport for many, rather than EV infrastructure for some (Jones, 2019).

Part 1: 2030 phase out of new ICE cars, and CO2 requirements for vans

- 1. Question 1 Do you agree with the Government's view that full hybrid and plug-in hybrid technologies only should be considered? Please explain your answer.**

The best choice to protect the health of the UK population is to phase out all non-zero emission drivetrain technologies at pace. While HEVs and PHEVs demonstrate fossil fuel reductions compared with ICE vehicles, both HEVs and PHEVs rely to varying extents on fossil fuels. This means both vehicle types emitting greenhouse gases during production and disposal and air pollutants (particles from tyre- and brake-wear), that harm health and further heat our climate to detrimental effect including avoidable deaths, even if only sustainable, carbon-neutral electricity is used to power the vehicles. In addition to fossil fuel reliance, both HEV and PHEVs fail to address our systemic reliance on private cars. This paradigm undermines transport equity as well as enabling a continued underinvestment in public transport and active travel, which both reduce the harm of car dependency and build community and individual wellbeing.

- 2. Question 2: Do you prefer a technological definition that permits both HEVs and PHEVs, or a technological definition that permits PHEVs only? Please explain your answer.**

Answer. Reduction in CO₂ emissions is critical if we are to avoid the worst health harms of climate breakdown. Based on the calculations provided by the Government in the consultation documents, looking only at tailpipe emission, this would mean adopting Option E which relies on PHEVs only. However, a comprehensive assessment would include a consideration of the environmental and related health impacts of all aspects of production and use of the cars in question. This should incorporate exacerbation of inequalities, poor air quality, traffic, and the lost opportunity to rebalance transport policy to encourage public transport and active travel.

- 3. Question 3: Do you support no further CO2 requirements, a vehicle level CO2 cap, or a fleetwide CO2 requirement? Please explain your answer.**

Answer. Again, on the basis of our urgent need to reduce fossil fuel emissions rapidly to mitigate climate change, Option E including a vehicle-level cap is the best option for tailpipe emissions, which are associated with increased morbidity and mortality related to asthma, heart disease, stroke, and mental ill-health. Even so, all cars



contribute to air pollution to some extent and reducing car use overall is the best option for the public's health. This also has the benefit of increasing physical activity, and thereby improving physical and mental health.

4. Question 6: What are your views on establishing a CO₂ requirement for vans from 2030? What is your preferred measure, if any, and at what level should the target be set? Please explain your answer.

Answer. In terms of climate and health impacts, there are no differences in the harms arising from van-associated CO₂ and that associated with cars. For this reason, we would welcome changes requiring the swiftest possible end to non-ZEV vans as with cars.

5. Question 7: What would be the impact to the economy and to UK society of any new or additional non-ZEV CO₂ requirements in the van sector from 2030? Please explain your answer and provide evidence where possible.

We affirm that the economy is inseparable from the health of our climate and our populations. Therefore, we advise that any assessment of economic impact from any new or additional non-ZEV CO₂ requirements in the van sector should be comprehensive in scope, taking a whole of economy view that includes for example the costs to the NHS and in lost productivity from congestion and from the health harms of air pollution – estimated to cost the UK economy up to £20bn – and climate change driven by CO₂ and other van emissions. Motor vehicle traffic also causes community severance (the barrier effect of busy roads), estimated to cost at least 1.6% of GDP per year in this country (Anciaes 2022).

6. Question 8: What are your views on current measures to support demand for zero emission vehicles? What additional measures could further support the transition?

Although we agree with phasing out ICE vehicles as quickly as possible, we are concerned that the focus on a shift to ZEVs alone will not reduce harms to sustainability, health and equity from transport associated with private vehicles like cars and vans. EVs are better than ICEs for carbon emissions, but there is still considerable embedded carbon in EVs. They still cause air pollution through tyre- and brake-wear, alongside the other harms of car use and car dependence, for example lack of physical activity, road traffic injuries (RTIs), and undermining community spaces.

Encouraging sales of EVs on its own will benefit the car industry, which needs people to buy new cars repeatedly, but increases costs to people with no alternatives if we fail to invest in other modes of transport such as more reliable, affordable, and accessible trains and buses. We need to think much more progressively about not



just about moving to EVs but also transitioning away from car dependence so that everyone has realistic, more sustainable alternatives. There could instead be a focus on growing jobs in public transport and in supporting active travel instead of any growth in manufacture of cars, ensuring a just transition that fosters good health and strong communities.

Part 2: Vehicle Emissions Trading Schemes Updates

7. **Question 13: Are the time limits on the current flexibilities in the ZEV Mandate for cars and for vans still appropriate? Please explain your answer.**

We reiterate that a reduction in vehicle-associated CO₂, other GHG emissions, NOx and particulate pollution must be achieved as comprehensively and rapidly as possible. This is essential to meet net zero and cut deadly air pollution associated with approximately 28,000 to 36,000 preventable deaths each year. So-called flexibility in the ZEV mandate can be anticipated to prove a barrier to suitably rapid and wide emissions reductions. As importantly, it does not assist in creating a modal shift away from driving and towards public transport, walking, wheeling and cycling, and thereby achieving significant economic, health and social benefits.

References

Jones SJ If electric cars are the answer, what was the question? *British Medical Bulletin*, 2019, 1–11 doi: 10.1093/bmb/ldy044

Anciaes P et al. The cost of the wider impacts of road traffic on local communities: 1.6% of Great Britain's GDP. *Transportation Research Part A*. 2022; **63**:266-287.
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