

Dear Licensing

Re: Consultation on Proposed Taxi Emissions Policy

I would like to voice my concerns over the proposed Euro standards based emissions policy. While I agree with the aim of the policy I do not believe it goes far enough in order to achieve the results it sets out to.

- In my opinion the policy has too long a lead in time until any emissions improvements will be recognised.
- Euro standards aim to incrementally improve vehicle emissions, but have been shown not to be as effective in real world driving conditions as they should be. This has been shown to be especially marked in diesel vehicles. This means that even when the taxis are all Euro 5, they may not actually be much cleaner in terms of their emissions.

In order for the policy to be effective my recommendation is that it is complimented with other measures to clean up the vehicles. Possible options for doing this:

- Retrofit vehicles to run on LPG - this has been successfully carried out on LTI taxis in Birmingham. The company replaced the diesel engine with a 2.0 litre turbo petrol engine and LPG system - emissions testing has shown that this improves a TX4 from below Euro 3 standards in real world driving to Euro 6 standard).
- Petrol Conversion - A scheme simply replacing the old diesel engines with a new efficient Euro 6 petrol engine would see significant emissions improvements.
- Electric - Over the next few years there will be increased options for moving over to electric vehicles.

I would recommend that a mechanism incentivising options such as the ones outlined above is built into the emissions policy. As the new emissions policy also recommends that the length of time that taxis are licenced be reduced to 15 years, I would recommend that vehicles retrofitted using the options outlined above (or potentially other innovative ideas) would be able to keep their vehicles licenced to the fleet for 20 years from the year of manufacture.

If grant funding becomes available it will be used to implement these schemes and help minimise any upfront cost to drivers, although this cannot be guaranteed.

Regards Ross

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