

Response to Consultation: Updating the Minimum Emission Standard for New Road Vehicles

Executive Summary

Fuels Industry UK welcomes the opportunity to respond to this consultation on updating the minimum emission standard for new road vehicles. Our members refine and supply over 85% of the UK's transport fuel and own and operate the UK's remaining refineries and critical fuel supply infrastructure, including terminals, pipelines and forecourts. They are essential to both today's energy security and tomorrow's transition to low carbon mobility.

The fuels sector plays a central role in reducing transport emissions through:

- Continuous improvements in fuel quality
- Deployment of lower carbon and renewable fuels
- Investment in infrastructure to support a diverse pathway to net zero

We support *ambitious but deliverable* regulatory frameworks that:

- Improve air quality
- Maintain UK competitiveness
- Avoid unnecessary regulatory divergence
- Enable continued investment in fuels, vehicles, and associated infrastructure

Support for updating the emissions standard to Euro 7 is contingent on consideration for any unintended consequences on fuel quality that impact security of supply and costs.

Questions on the individual or organisation

Q1: What is your full name?

Daniel Greenblatt

Q2: What is your email address?

Q3: Are you responding on behalf of an organisation?

Yes

Q4: What is the full name of the organisation?

Fuels Industry UK

Q5: How many people's views does your response represent?

The 6 major petroleum product manufacturers and suppliers in the UK, including: bp, EET Fuels, ExxonMobil (Esso), Phillips 66, Shell, and Valero.

Q6: Your organisation type is:

Another type of organisation – fuel sector trade body

Questions on the proposals

Q7: Do you agree or disagree with the proposal to update the minimum emission standard in Great Britain to Euro 7?

No firm view.

- Fuels Industry UK supports alignment with Euro 7 to:
 - Improve air quality outcomes
 - Maintain regulatory consistency with the EU and Northern Ireland
 - Provide clarity for vehicle manufacturers and fuel suppliers
 - Alignment reduces the risk of a fragmented vehicle parc that complicates fuel supply, infrastructure planning, and compliance.
 - Begin to hold non-ICE vehicles to the same high standards, such as through consideration of non-tailpipe emissions and battery capability standards.
 - However, consideration for any unintended consequences that impact fuel supply and cost should be taken.
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Q8: Do you agree with the proposed implementation approach to maximise approval routes?

No response.

Q9: Other implementation suggestions?

- Ensure use of fuel standards already developed, such as BS EN 228 (petrol) and BS EN 590 (diesel), to prevent fuel supply disruption.
 - Acknowledging that CO₂ emissions from the vehicle are not indicative of carbon intensity and the role that lower-carbon fuels play in overall decarbonisation.
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Q10: Challenges arising from the implementation approach?

Key challenges for the fuels and wider transport system include:

- Risk of narrowing decarbonisation pathways:
 - Over-emphasis on tailpipe standards could undervalue lower carbon fuels delivering immediate emission savings in existing fleets especially if non-tailpipe standards are not included in a timely manner.
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Q11: Do you agree with the proposed implementation dates?

No response.

Q12: Do you agree with the proposed changes to ISC testing obligations?

No response.

Q13: Factors to determine minimum overall annual volume of ISC testing?

No response.

Q14: Factors to prioritise ISC testing under a risk-based approach?

No response.

Q15: Any other comments?

- Fuels Industry UK encourages government to:
 - Maintain a technology neutral approach to transport decarbonisation
 - Recognise the role of lower carbon fuels alongside vehicle standards in achieving transport decarbonisation
 - Ensure that current fuel quality standards are upheld to prevent any unintended consequences that impact fuel supply or create additional costs
- Emissions improvements from Euro 7 will only be maximised if:
 - High quality and compliant fuels remain available with a secure and resilient domestic supply
 - This needs Investment in fuel production and infrastructure to remain viable
- A stable and coordinated regulatory framework is essential to sustaining:
 - UK energy security
 - Industrial competitiveness
 - Progress toward net zero