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By email to zevmandate@dft.gov.uk

Zero Emission Vehicle Mandate Review

Dear Sir or Madam,

Fuels Industry UK represents the six main oil refining and marketing companies operating in the UK. The Fuels Industry UK member companies – bp, Essar, Esso Petroleum, Phillips 66, Shell, and Valero – are together responsible for the sourcing and supply of product meeting about 85% of UK inland transport fuels and accounting for 48% of UK final energy consumption¹.

The refining and downstream oil sector is vital in supporting UK economic activity. It provides a secure supply of affordable energy for road and rail transport, aviation, and marine applications, as well as for commercial and domestic heating. It also supplies base fluids for use in lubricants, bitumen for use in road surfacing, and graphite for use in electric vehicle batteries and as electrodes in steel and aluminium manufacture.

Fuels Industry UK welcomes the opportunity to respond to the Zero Emission Vehicle Mandate Review.

We have considered the questions in the review and note that these relate to the functioning of the Zero Emission Vehicle (ZEV) mandate itself, rather than being related to wider transport decarbonisation. Fuels Industry UK members have commercial interests across conventional and lower carbon fuels, in addition to electric vehicle charging infrastructure. We are unable to comment on these detailed questions; however, we would like to take the opportunity to voice our concerns regarding the

¹ Based on the Department of Energy Security and Net Zero Digest of UK Energy Statistics 2026

design of the UK ZEV Mandate with regards to accounting for full life cycle emissions and further recognition of the role of lower-carbon fuels (LCFs).

ZEVs, defined by the DfT by their tailpipe emissions only, will have a role in reducing the UK's transport emissions. However, Fuels Industry UK disagrees with the narrow definition of ZEVs within the Mandate's scope, as simply qualifying by emitting no CO₂ from the exhaust fails to account for the full life cycle emissions of Battery Electric Vehicles (BEVs) and Fuel Cell Electric Vehicles (FCEVs). This approach disadvantages internal combustion engine vehicles (ICEVs) that, when powered by LCFs or hydrogen, can provide significant emissions reductions.

We note work carried out by the Zemo Partnership² which shows that ICEVs powered by LCFs or hydrogen can achieve comparable life cycle-based emissions to ZEVs (as defined by the DfT) within certain pathways.

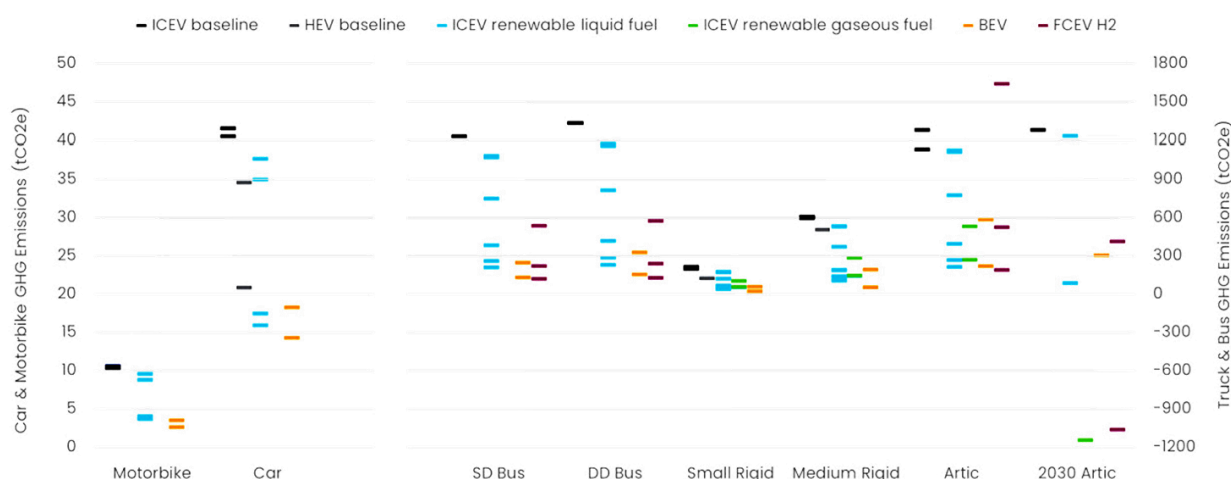


Figure 1: life cycle greenhouse gas emissions for all applications (adapted from Zemo Partnership³)

The results presented in Figure 1 show that renewable fuels can significantly lower life cycle greenhouse gas (GHG) emissions compared with traditional fossil-derived transport fuels. In many of the vehicle segments examined, some renewable fuel options even outperform current BEVs supplied by grid electricity in terms of overall emissions reductions. Heavy-duty vehicles provide a notable example where renewable diesel achieves estimated life cycle GHG savings of between 79% and 83%, while equivalent battery electric vehicles achieve reductions ranging from 54% to 80%. These values are calculated relative to a baseline diesel vehicle operating on standard retail fuel and differ by vehicle category.

² <https://www.zemo.org.uk/assets/reports/Vehicle%20life%20cycle%20GHG%20emissions%20study%202024.pdf>

³ Ibid.

The EU has already acknowledged that the use of low carbon fuels can also meet sustainability requirements and offer combustion engine vehicles a route to net zero.⁴

Fuels Industry UK advocates for a coherent road transport decarbonisation policy that is technology-neutral and allows for the use of multiple decarbonisation technologies, driven by consumer choices rather than policy. This should include the use of a life cycle assessment to fully reflect environmental impacts, rather than the solely tailpipe-based emissions criteria that is currently in place.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Chris Gould', is shown on a light blue background.

Chris Gould
Energy Transition Lead, Fuels Industry UK

⁴ https://theicct.org/wp-content/uploads/2025/12/ID-537---EU-CO2-proposal_policy-brief_final.pdf