The Chartered Institute of Logistics and Transport

New Heavy Goods Vehicle CO_2 Emissions Regulatory Framework for the United Kingdom

Response by the Chartered Institute of Logistics and Transport (UK) to the

Department for Transport and Office for Zero Emission Vehicles Consultation

March 2026

Introduction

The Chartered Institute of Logistics and Transport UK (CILT(UK)) welcomes the opportunity to respond to the Department for Transport consultation on a new regulatory framework for reducing CO_2 emissions from heavy goods vehicles.

CILT(UK) represents logistics, freight and transport professionals responsible for the planning and operation of supply chains across the United Kingdom. Our members include fleet operators, logistics service providers, infrastructure planners, vehicle manufacturers, consultants and public authorities. Collectively, they manage the systems that move goods across the national economy.

CILT does not lobby on behalf of particular commercial interests. Our role is to lead informed debate, convene expertise across the sector, and support government and industry in understanding the practical implications of policy choices.

This response reflects a synthesis of published analysis, operational experience from CILT(UK) members, and discussion within the CILT(UK) Freight and Logistics Policy Group and Environment Policy Group. It draws on analytical work produced by organisations such as CALSTART and Zemo Partnership while incorporating practical insights from UK logistics professionals.

The decarbonisation of road freight is both necessary and achievable. However, the transition must be managed to maintain supply-chain reliability, ensure continued vehicle availability in the UK market, and support the many small and medium-sized operators that form the backbone of the logistics sector.

The decarbonisation of road freight will succeed only if policy addresses vehicles, infrastructure, energy systems and freight markets together as a single system.

Vehicle regulation alone cannot deliver the transition. Progress will depend equally on the timely deployment of charging infrastructure, the availability and price of electricity, and the commercial structures that shape freight demand.

Clear signals set now can help establish the market conditions needed to support investment and innovation, enabling a smoother transition over time.

CILT therefore supports a balanced and practical framework that:

- aligns rapidly with EU CO_2 certification rules to maintain regulatory consistency and vehicle supply
- introduces a sales-based zero-emission vehicle (ZEV) mandate with realistic and reviewable targets
- considers additional demand-side measures later only if market progress proves insufficient.

This approach reflects the broad consensus emerging from expert submissions while recognising the operational realities facing the UK freight sector.

Part A: Current Market Status

Q1 – Alignment with EU Certification Regulation (EU) 2017/2400

Answer: Yes — the UK should align as soon as possible.

Technical alignment minimises compliance burdens for global manufacturers, protects vehicle supply in the UK market (particularly coaches), and ensures continued use of the updated VECTO tool.

Early alignment also prevents regulatory gaps that could allow higher-emission vehicles displaced from other regulated markets to enter the UK.

The CILT working group, therefore, encourages the Government to move quickly so that the UK remains aligned with the EU regulatory trajectory.

Part B: New Regulation Options for HGVs

Q2 – Option 1: Strengthened and expanded CO_2 standard

Answer: Support as the immediate baseline, but not as the sole instrument.

CO_2 standards are technology-neutral and may initially be met through incremental improvements in diesel efficiency rather than the rapid deployment of zero-emission vehicles.

For this reason, they should be combined with supply-side policy signals.

The UK should adopt an EU-aligned CO_2 standard as an immediate step while developing a ZEV mandate. We understand that following this consultation the government plans to set an overall policy direction and then consult again on the finer details of exemptions etc. While we would agree with the need for thorough consultation to get the policy details correct, there is a danger that by the time legislation is passed there will be little time left for action. We would therefore suggest that aligning with the EU standard should be done immediately as a first step following this consultation, with further policy measures to follow.

Q3 – Option 2: ZEV mandate limiting sales of non-zero-emission HGVs

Answer: Support, with realistic and reviewable targets.

A sales-based zero-emission vehicle (ZEV) mandate provides regulatory certainty for manufacturers and charging infrastructure providers.

It would help bridge the transition from today's low market share of zero-emission trucks to the Government's phase-out targets:

- **2035** for vehicles under 26 tonnes
- **2040** for vehicles 26 tonnes and above.

Targets should be achievable within the context of the UK's relatively small right-hand-drive market. They should include formal review points to reflect developments in vehicle costs, electricity prices and infrastructure rollout.

Q4 – Should option 2 be accompanied by a CO2 standard for non-ZE HGVs?

Answer: Yes.

A CO_2 standard for residual ICE models during the transition ensures the UK benefits from best-available efficiency while the mandate drives ZEV volumes. The two tools are complementary rather than duplicative.

Q5 – Fleet purchasing or leasing requirements

Answer: Do not introduce as a mandatory measure at this stage.

A universal fleet mandate risks unintended consequences, including disproportionate impacts on small operators and unnecessary administrative complexity. However, we still see the value in demand side measures, and so would recommend them as part of an overall policy package with the following suggestions and caveats:

1. They should only be introduced as part of an overall policy package, including not just a strengthened CO2 standard and ZEV mandate, but also joined up support on planning, grid connections, energy prices etc.
2. They should start as voluntary measures, but could be a prerequisite for accessing other support such as grants for vehicles and/or charging infrastructure. The date at which they would become mandatory should be set with several years' warning.
3. Any mandatory measures should fall first on buyers of freight rather than hauliers. This will help to ensure costs are passed onto consumers rather than squeezing the already small margins of hauliers, and is more likely to shape vehicle procurement decisions across supply chains.
4. Sharp and oversimplified thresholds for compliance must be avoided. While it will be necessary to first target those fleets most able to comply, simply targeting all fleets over 100 vehicles, for example, would result in a lot of fleets restructuring in artificial ways to avoid having more than 99 vehicles.

Q8 – Preferred policy combination

CILT recommends the following approach:

Immediate action (before further consultation on other measures, enact in 2026):

- Align CO2 standards for HGVs with those in Europe

Primary measures:

- ZEV sales mandate
- CO_2 standards for remaining ICE vehicles.

Possible future measure:

- Targeted at demand-side policies focused first on freight buyers, if required.

Q9 – Supporting policy measures

Key enabling policies include:

Residual value guarantees
to support leasing markets and accelerate the development of a second-hand market for zero-emission trucks.

Electricity cost reform
including targeted relief on non-commodity charges and support for smart charging.

Consider guidance enabling fuel-surcharge-style pass-through for electricity price in logistics contracts.

Grid connections and planning

Grid connection delays are an issue for depot electrification, but some public reporting has overstated the scale of the problem. In most parts of the country, operators can obtain connections within roughly a year.

London is a notable exception due to rapid growth in electricity demand and space constraints for new infrastructure. Policy should therefore recognise urban network constraints without designing the national framework around an outlier.

Make Regional/Local Energy Systems Planning statutory in England (as in Scotland) so DNOs/IDNOs can invest ahead of need, with accelerated connections and streamlined wayleaves where appropriate.

Infrastructure support

Financial support for charging infrastructure needs to continue, and in particular needs to support those operators who will find it most difficult to charge. For many fleets that are either too small or do not have their own depots (or do not have depots that are suitable for charging) this may mean providing support to third party providers of facilities that are shared between several fleets. Such providers are better equipped to deal with DNOs and equipment suppliers, better able to negotiate cheaper electricity prices, and have better knowledge of site design, fire risk and other key considerations. Without targeted financial support, such third party charging providers will service the most profitable sites/fleets first, and leave some locations and/or fleets without infrastructure.

Infrastructure strategy

The national truck charging strategy should allow multiple technological solutions to develop where they are most effective, including:

- Megawatt Charging System (MCS)
- battery swapping
- overhead catenary systems
- wireless charging.

Battery swapping in particular may become commercially viable if integrated vehicle-and-infrastructure models emerge, including potential investment from international vehicle manufacturers.

Payload/weight rules

Review the system of weight derogations for e.g. additional weight of batteries to ensure that they function as intended. Current derogations on some aspects of vehicle weight are undermined if they are not accompanied by derogations on other aspects, and loss of payload is a major barrier to ZE-HGVs in some sectors.

Part C: Defining Zero-Emission Vehicles

Zero-emission HGVs should be defined strictly as vehicles with **zero tailpipe CO_2 emissions**, including:

- battery-electric vehicles
- fuel-cell electric vehicles.

Low-carbon fuels may help reduce emissions from the legacy fleet, but they should not qualify as zero-emission technologies under this regulation.

Q10 – Exclusion of ZE HGVs 3.5–4.25 tonnes from HGV regulation

Answer: Yes

Our understanding is that under current derogations, ZEVs in the 3.5-4.25t range are classed as vans and fall under the van regulations.

Q11 – Include coaches in the HGV CO_2 framework?

Answer: Yes.

We see no reason why coaches should be excluded from this policy, notwithstanding previous comments regarding the need for a full package of support.

Q12 – CO_2 reduction targets for trailers

Answer: Yes include trailers and TRUs.

This closes loopholes (e.g., diesel TRUs) and encourages innovation across the whole combination.

Part D: Flexibility and Enforcement

Flexibilities should be **limited and carefully defined** to maintain policy credibility while allowing practical implementation.

Possible mechanisms include:

- limited banking and borrowing of credits
- tightly controlled credit transfers between zero-emission vehicle categories.

Part E: Uptake Trajectory

CILT supports introducing a ZEV mandate beginning around **2028**, with trajectories aligned with the Government's phase-out targets:

- **2035** for vehicles under 26 tonnes
- **2040** for vehicles 26 tonnes and above.

Targets should be reviewed periodically to reflect developments in technology costs, electricity prices and infrastructure availability.

Conclusion

The transition to zero-emission heavy goods vehicles represents one of the most significant structural changes in the history of road freight transport.

Success will depend not only on vehicle technology but on the wider system that supports freight operations. Charging infrastructure, electricity pricing structures, grid connections, vehicle financing and freight market dynamics will all influence how quickly and effectively the transition can occur.

Technology is also evolving rapidly. Earlier concerns about battery degradation appear to be diminishing as battery chemistries improve. In particular, lithium-iron-phosphate (LFP) batteries are demonstrating greater durability and cycle life than previously expected. Continued monitoring is appropriate, but battery longevity may not prove to be the constraint once anticipated.

The global truck market is also changing quickly. Chinese manufacturers are likely to play an increasingly significant role in the electric HGV market, potentially introducing new vehicle platforms and infrastructure models such as battery swapping networks. Greater competition in vehicle supply could accelerate adoption and reduce costs, while regulatory alignment with the EU will remain important to maintain access to vehicle models in the UK market.

The freight sector is highly diverse, and many smaller operators rely on the second-hand vehicle market. Some of the detailed issues affecting SMEs and specialist fleets may therefore require further policy development and consultation as the transition progresses.

CILT(UK) recommends that the Government prioritise four actions:

1. Align rapidly with EU CO_2 certification rules
to maintain regulatory consistency and protect vehicle availability in the UK market.

2. Introduce a realistic sales-based ZEV mandate
supported by achievable trajectories and formal review points.

3. Maintain CO_2 standards for internal combustion vehicles during the transition
so that the remaining diesel vehicles continue to improve in efficiency.

4. Address wider system barriers
including electricity prices, grid connections, depot charging infrastructure and access to finance.

Particular attention should be given to enabling a healthy second-hand market for zero-emission trucks, which will be essential if smaller operators are to participate in the transition.

CILT(UK) and its members would welcome continued engagement with the Department for Transport as the policy framework develops.

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