

Timber Transport Forum response to the Department for Transport Consultation on when to phase out the sale of new, non-zero emission heavy goods vehicles

The Timber Transport Forum welcomes the opportunity to contribute to the UK Government's plans to move towards a low carbon economy. The Timber Transport Forum is a voluntary partnership of local roads authorities, the forest industry and national agencies and organisations. The Forum is concerned with supporting the forest and timber industries, a £1bn sector that involves up to 20% of our land area, provides around 29,000 jobs, mostly in remote rural areas of the UK, and is vital in addressing the climate emergency by storing and sequestering atmospheric carbon and providing low-carbon alternatives to more environmentally damaging and greenhouse gas generating materials. The forest and timber industries move 10 million tonnes of logs from UK forests to processors every year over more than 10,000km of minor rural roads.

Members comprise representatives from the Convention of Scottish Local Authorities, the Local Government Association, Forest Industries (Confederation of Forest Industries and UK Forest Products Association), Forestry Commission England, Scottish Forestry, the Welsh Government, the Rail Freight Group, Road Haulage Association, Scottish Enterprise, the Scottish Government, and the Society for Chief Officers of Transportation in Scotland. More details can be found at www.timbertransportforum.org.uk.

Below are the answers to question posed in the consultation document.

Question 1

Do you agree or disagree that introducing a phase-out date for the sale of new nonzero emission HGVs will help us meet our legally binding net zero target? Please explain your answer.

The Timber Transport Forum agrees in principle that that introducing a phase-out date for the sale of new nonzero emission HGVs will help the UK government meet its legally binding net zero target. However, the Timber Transport Forum recommends that financial assistance is provided for hauliers to invest in zero-emission tractor units to facilitate the replacement of nonzero emission HGVs within the proposed timeframe. As forestry is very much a rural industry, solutions will have to be found to refuel vehicles in relation to the provision of infrastructure.

Question 2

Do you agree or disagree with our approach to split the phase out dates for new non-zero emission HGVs into two weight categories? Please explain your answer.

The Timber Transport Forum agrees in principle with HM Government's approach to split the phase out dates for new non-zero emission HGVs into two weight categories. However, the phase out date would need to consider the status of refuelling infrastructure in the case of hydrogen-powered vehicles and charging points for battery-powered vehicles. Timber hauliers operate in remote, rural locations and will not be able

to comply with the proposed phase out dates unless appropriate refuelling infrastructure is in place. The locations of refuelling infrastructure would likely be determined from demonstrator trails.

Question 3

Do you agree or disagree that 26 tonnes and under, and more than 26 tonnes are the right categories? What evidence do you have for or against?

The Timber Transport Forum agrees in principle with these categories. HGVs used to transport timber almost exclusively weigh 26 tonnes or less.

Question 4

Do you agree or disagree with our proposal to end the sale of new nonzero emission HGVs, for vehicles weighing from 3.5 up to and including 26 tonnes, by 2035? What evidence do you have for or against?

The Timber Transport Forum agrees in principle with the proposed 2035 date for a phase out of vehicles weighing up to and including 26 tonnes. However, in order for timber hauliers to use zero emission HGVs on timber haulage routes, the challenge of installing refuelling infrastructure in strategic and rural locations in the UK would need to be resolved.

Question 5

What do you consider the main challenges and barriers to meeting this target for HGVs 26 tonnes and under?

The main challenges and barriers to achieving this target is firstly the lack of alternatives-to-diesel refuelling/charging infrastructure in remote areas, particularly in remote, rural areas of the UK. Secondly, the cost of electric HGVs coming to market will be higher than conventional diesel-fuelled vehicles. This increased cost will potentially be a barrier unless financial aid is provided for the purchase of zero emission HGVs.

Question 6

How can these barriers be addressed?

Studies or trials that identify potential locations of strategic fuelling/charging points that would make timber transport by non-diesel HGVs practicable could address the barrier associated with the current lack of infrastructure. There is also the issue of off-road vehicles and machinery working in the forests which will need appropriate infrastructure for refuelling. The barrier of higher costs associated with non-diesel HGVs could be addressed by providing financial support to enable firms to purchase non-diesel HGVs at an equivalent price to conventional diesel-fuelled HGVs.

Question 7

Do you agree or disagree with our proposal to end the sale of new nonzero emission HGVs, for vehicles weighing more than 26 tonnes, by 2040? What evidence do you have for or against?

The Timber Transport Forum agrees with this proposal in principle. Timber haulage is done almost exclusively on HGVs weighing 44 tonnes. The proposed end-of-sale date of 2040 should therefore be a sufficient timeframe for infrastructure to be installed on major transport routes. However, comprehensive rural infrastructure will be required within the same timescale to support the timber transport industry. In-forest refuelling will also have to be considered for off-road vehicles.

Question 8

What do you consider the main challenges and barriers to meeting this target for HGVs weighing more than 26 tonnes?

The main challenge/barrier is likely to be the cost of vehicles and the cost of installing refuelling/charging infrastructure in extreme rural areas with potentially the provision of mobile charging infrastructure for in-forest work.

Question 9

How can these barriers be addressed?

The needs to be immediate discussion between relevant agencies to understand these issues and plan for a solution that does not prejudice the forest industry.

Question 10

Do you agree or disagree that these phase-out dates should be extended to all nonzero emission HGVs, including those using low carbon fuels, in their respective weight categories? Please explain your answer.

The Timber Transport Forum agrees in principle with this proposition. Zero carbon fuels facilitate the aim of decarbonisation of transport, which the Forum supports. Low carbon fuels do not ultimately fulfil this aim. However, alternative solutions and dates may have to be considered if rural refuelling infrastructure cannot be effectively deployed.

Question 11

Do you agree or disagree that maximum permissible weights for certain zero-emission vehicles (mainly HGVs) on both international and domestic journeys should increase by up to 2 tonnes (without exceeding 44 tonnes)? Please explain your answer.

The Timber Transport Forum agrees in principle with this proposal. However, the reduction in payload may lead to an increase in timber haulage costs.

Question 12

Do you agree or disagree that weight limits should increase by up to a maximum of 1 tonne for certain alternatively fuelled HGVs on both international and domestic journeys (without exceeding 44 tonnes)? Please explain your answer.

The Timber Transport Forum agrees in principle with this proposal. However, the reduction in payload may lead to an increase in timber haulage costs.

Question 13

Do you agree or disagree that weight limit increases should only offset any additional weight due to the alternatively fuelled or zero emissions technology? Please explain your answer.

The Timber Transport Forum agrees with this proposal in principle. Additional weight not associated with alternatively fuelled or zero emissions technology would be retrograde and potentially detrimental to a haulier's business.