

Rt Hon Louise Haigh MP

Secretary of State
Department for Transport
Great Minster House
33 Horseferry Road
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20 November 2024

Joint letter: The ambition of the ZEV mandate must be upheld

Also for the attention of: Rt Hon Ed Miliband MP, Rt Hon Jonathan Reynolds MP, Lilian Greenwood MP, Kerry McCarthy MP, Sarah Jones MP

Dear Secretary of State,

As representatives of 14 NGOs, think tanks and campaign groups, **we are writing to call on you to uphold the ambition of the zero emission vehicle (ZEV) mandate**, ensuring that existing targets and penalties remain in place and flexibilities remain limited, so as to not undermine the regulation. The Government should instead continue supporting the EV transition through targeted policies to boost public confidence and demand.

The ZEV mandate is one of the UK's single biggest carbon saving measures to date¹, and one of the world's leading supply-side regulations for the transition to electric vehicles (EVs). It has helped the UK to pull in EV supply ahead of the rest of Europe - with the share of new car sales currently the highest of the biggest five car markets in the EU and UK², and keeping pace with rising global markets³. It is also helping to bring down prices, making EVs more competitive and affordable for the public. Dropping EV prices isn't a sign of market failure - it's by design. Regulations create markets, and that's exactly what the ZEV mandate is doing for more affordable EVs⁴.

With more affordable models and competitive deals already hitting the market in recent months, EVs have made up over 20% of new sales for three consecutive months, with September seeing a record month for EV sales volumes. We're likely to see bumper EV sales in the final two months of the year as we have in previous years⁵.

¹ [Green Alliance](#), Net Zero Policy Tracker (March 2024 update)

² [ACEA](#), September 2024. Top five EU + UK markets: Germany, UK, France, Italy and Spain.

³ 12% year-on-year increase in sales globally - see [New AutoMotive](#). Global EV Tracker October 2024.

⁴ Nearly a dozen new EV models under £21,000 have or will hit the European market in 2024 and 2025, with EU and UK regulations playing a key role - see [Transport & Environment](#), Stagnation & Growth: The European EV Market

⁵ [New Automotive's Electric Car Count](#)

The regulation was heavily consulted on through three extensive consultations, numerous stakeholder workshops and wider, private engagement with industry and civil society groups. As a result of these consultations and engagement, the Government at the time agreed to include generous flexibilities for manufacturers for the first three years of the regulation, to provide a softer pathway for those that were further behind on EV development and production. These flexibilities mean that, even though the market is below the headline 22% target for 2024, manufacturers can and will comply⁶ as a result of selling more efficient non-ZEV cars, being able to borrow credits from future years or purchase credits from other manufacturers.

Collectively, these flexibilities, alongside increasing ZEV sales, are more than sufficient to create an excess of credits in 2024, easing the compliance pathways for all manufacturers to meet targets. If the government was to respond to industry lobbying by granting additional flexibilities, it could undermine the ambition of the regulation by lowering the share of EV sales needed to comply. As a result, it would lower the climate impact of the regulation and make it harder for the UK to hit its legally binding carbon budgets and Nationally Determined Contributions under the Paris Agreement.

The regulation provides certainty to manufacturers and the public. Reopening discussions about the ZEV mandate puts at risk investments like the £6 billion committed by the charging industry⁷ and the wider £23 billion in EV and battery investment announced in the UK - as well as further denting the confidence of the public.

Leading on EVs is an industrial opportunity for the UK and will support the Government's clean energy mission to reduce reliance on volatile fossil fuels. A strong domestic market and regulation can support and attract domestic EV manufacturing and supply chains. The EV transition is critical for the future of the industry, economic growth and the high quality jobs that support it⁸. However, it should be noted that 80% of vehicles made in the UK are exported⁹ - meaning that the majority of vehicles made here are unaffected by the ZEV mandate.

Weakening one of the most ambitious and significant pieces of climate policy left behind by your predecessors would be at odds with this Government's ambition to take a world-leading approach to climate action¹⁰. In fact, weakening the ZEV mandate would call into question whether the UK can meet its legally binding climate targets, particularly in view of the requirement to come forward with a new Carbon Budget Delivery Plan by next spring.

We strongly urge the Government to maintain the ambition of the ZEV mandate, build on positive announcements in the Budget to continue supporting the EV transition through targeted policies to boost public confidence, and secure the UK's position as a major investment destination for clean technology.

⁶ [New Automotive](#) analysis shows that when taking into account the CO2 flexibility, the average target for carmakers in 2024 is 18.1% which has already been hit

⁷ [ChargeUK](#)

⁸ [CBI Economics](#) (commissioned by ECIU), Electrifying Growth

⁹ [Transport & Environment](#), Why an ambitious ZEV mandate will not effect UK jobs

¹⁰ [UK Government](#), PM remarks at COP29

Yours sincerely,

Anna Krajinska, Director, **T&E UK**

Doug Parr, Chief Scientist and Policy Director, **Greenpeace**

Warren Phillips, Chair, **EVA England**

Ben Nelmes, CEO, **New AutoMotive**

Dan Caesar, CEO, **Electric Vehicles UK**

Quentin Willson, Founder, **FairCharge**

Silviya Barrett, Director of Policy and Campaigns, **Campaign for Better Transport**

Nicholas Davies, Head of Climate Policy, **Green Alliance**

Oliver Lord, UK Head, **Clean Cities Campaign**

Theo Bertram, Director, **Social Market Foundation**

Rosanna Downes, Head of Campaigns, **Friends of the Earth**

Dominic Phinn, Head of Transport, **Climate Group**

Ned Hammond, Head of Energy and Environment, **Onward**

Kyle Lischak, Head of UK, **ClientEarth**