



Department
for Transport

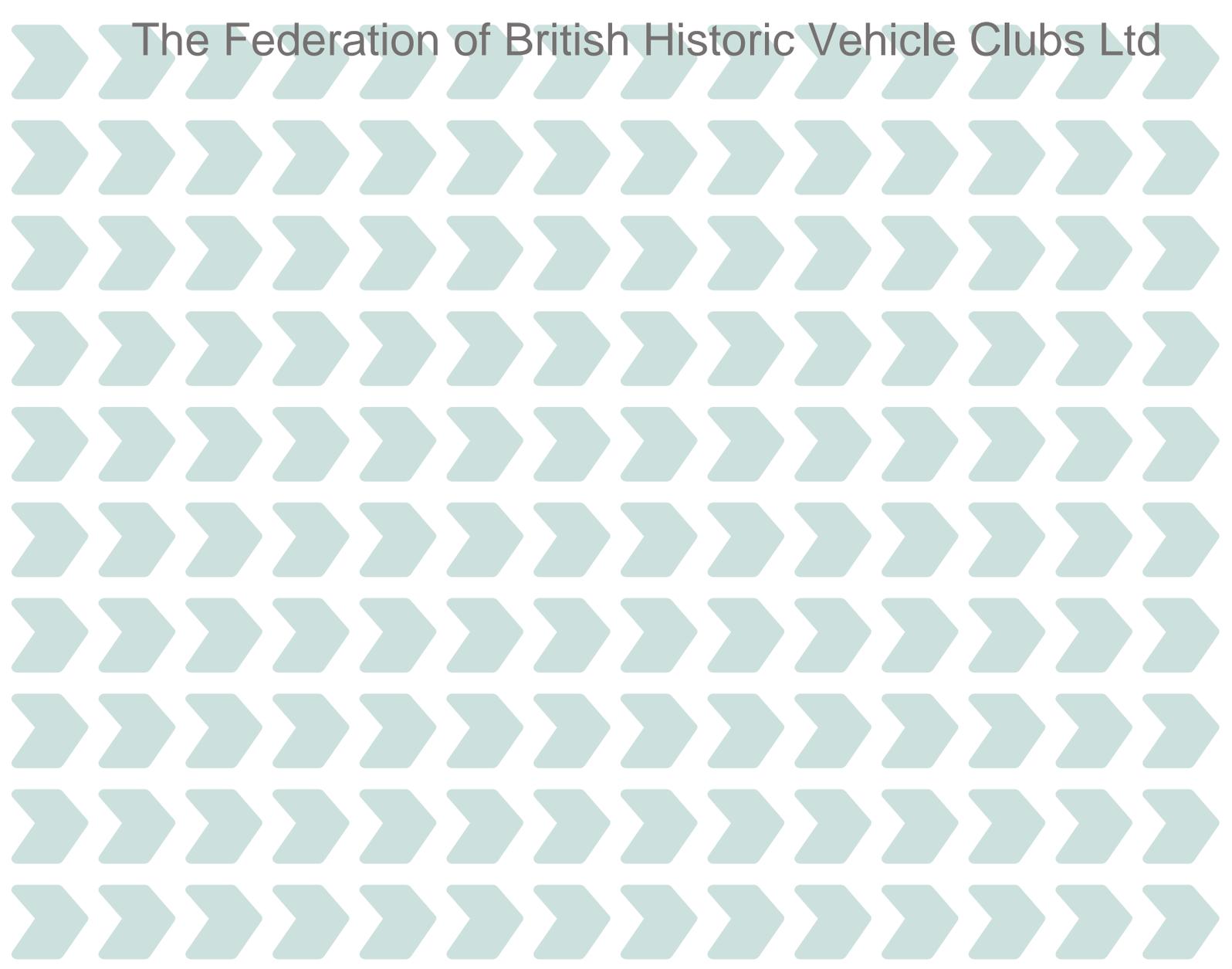
Introducing E10 Petrol: consultation

Annex D: Response form

Submission by



The Federation of British Historic Vehicle Clubs Ltd



1. Introduction and data protection

The consultation period begins on 4 March 2020 and will run until 23:45 on 19 April 2020. Please ensure that your response reaches us at the following email or postal address **on or before** the closing date.

Please send consultation responses by, ideally by email, to:

LowCarbonFuel.Consultation@dft.gov.uk

Name: Tim Simon
Address: Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR.

If you would like further copies of this consultation document you can contact Tim Simon - details above - who can also help if you need alternative formats (Braille, audio, CD):

When responding, please state whether you are responding as an individual or representing the views of an organisation. If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled. If you have any suggestions of others who may wish to be involved in this process please contact us or forward the document to them.

The responses to this consultation are likely to be discussed with representatives of the sector, as well as within the Department. Therefore the points you raise may be shared. If you are not content for this to happen please let us know. Subject to the outcome of the consultation the amendments to the legislation will be introduced as soon as practicable.

Confidentiality and data protection

The Department for Transport (DfT) is carrying out this consultation to gather views on E10 policy. This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the Controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed.

2. Responding

1. Your name and email address. We will only use this if we need to contact you to ask about any of your responses and to update you when we publish our response.

Name	David Daniel
Email	legislationmanager@fbhvc.co.uk

2. Are you responding: *

<input checked="" type="checkbox"/>	On behalf of an organisation? Go to question 3
<input type="checkbox"/>	As an individual? Begin consultation response (section 2)

3. Organisation details: *

Company/Organisation Name	Federation of British Historic Vehicle Clubs Ltd
Address	PO Box 295 Upminster Essex
Postcode	RM14 9DG
Email	secretary@fbhvc.co.uk
Your Role / Position	Legislation Manager
Please tick one box below that best describes your company or organisation.	
<input type="checkbox"/>	Micro business (0-9 employees)
<input type="checkbox"/>	Small business (10-49 employees)
<input type="checkbox"/>	Medium business (50-249 employees)
<input type="checkbox"/>	Large Company (250+ employees)
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input checked="" type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Other (please describe):

If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:

The Federation of British Historic Vehicles [FBHVC]

The Federation of British Historic Vehicle Clubs (the Federation) represents over 500 member clubs with a total membership of a quarter of a million historic vehicle owners and enthusiasts. Interest in historic vehicles sustains economic activity worth £5.5 billion annually to the UK economy and supports the employment of nearly 35,000 people.

Vehicles owned by Federation members include historic vehicles of many kinds, including cars, motorcycles, buses, coaches, lorries, vans, utility vehicles, military vehicles, tractors and other agricultural vehicles and steam engines. These vehicles range in age from thirty years old (the internationally accepted definition of historic vehicles as used by UNESCO) to vehicles built during Queen Victoria's reign. Our members restore and preserve these vehicles for their historic interest, exhibit them at exhibitions, shows, community fetes, etc. and currently use the country's highways both in order to attend at those events, but also to participate in touring events and for general leisure purposes.

The Federation, both itself and through its membership, is the primary national repository of knowledge and expertise on the subject of historic vehicles in general.

The members of the Federation affiliated clubs possess a greater number and more extensive variety of historic vehicles, particularly those dating from before the Second World War, than in any other EU Member State. This reflects the different historical experiences of the UK, especially the absence of land war on its territory. Historic vehicles do not form a part of the contemporary transportation structure of the nation. The primary purpose of their journey is seldom the transportation of either goods or people from one point to another but is rather the movement of the vehicle itself. Such use is largely an incidental part of their preservation, enjoyment and presentation to the public and to those having an interest in mobile heritage.

The Federation has responded previously to proposals in 2018 at which time a wide survey of member clubs was undertaken. The views of member clubs and individual members were fully explored at the time, along with the views of members who are specialists in fuel technology and have not changed. For this consultation, the proposals were examined by the Federation's Legislation Committee to verify that the Federation's views continued to reflect its member's interests.

3. Consultation questions

The questions below may not apply to all respondents. Please answer as many as are applicable to you or your business. In each case please set out the reasons for your answer and if applicable, alternative proposals.

Consultation proposals - Introducing E10 and keeping E5 available

Q 1 - Do you agree that the best way to introduce E10 petrol is as a direct replacement for the current 95 E5 premium grade? If not, please provide further information.	
Yes Yes	No
Additional information: The users of Historic Vehicles, generally described in the Consultation as “classic and cherished”, are widely spread through the country. Availability of the E5 “protection grade” fuel close to where they live is important to them. We therefore support this method of introduction, as it means that retailers will not be required to consider supplying three grades of petrol, which should maximise the availability of the “protection grade” fuel.	
Q 2 - Do you agree that introducing a minimum ethanol content of 5.5% in the 95 grade is the best way to ensure E10 is introduced across the UK? If not, what alternative would you propose?	
Yes	No
Additional information: As we support the proposed method of introduction we do not offer any alternative.	

Q 3 - Do you agree that the minimum ethanol content requirements should apply to filling stations that sell more than one million litres of fuel per year and that this would only allow certain specialist retailers to continue to sell 95 E5? If not, please provide further information and alternative suggestions.

Yes	No
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Additional information:

We have no view on a permission for smaller stations to continue to sell 95 octane, as long as it does not prejudice any existing availability of the existing Super Grade fuels as originally defined in the Call for Evidence at paragraph 40. This was the fuel required by the Protection grade which expired in 2016. It is important to note that in fact at least some (if not all) of the Super grade fuels currently offered have an octane rating which exceeds 97, normally being 99 octane. These fuels are important to a number of our members with cherished vehicles, including some British executive saloons dating from the 1960s, have an ongoing need for these high-octane fuels. We therefore hope that in the transition period and afterwards the availability of the existing “Super” Grade fuels will be maintained at a minimum at its current level.

Q 4 - Do you agree that there should be an exemption for filling stations supplied from fuel terminals that are in turn supplied by ship? Is this definition suitable? Should other terminals be included or should a different or no exemption be applied?

Yes	No
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Additional information:

Our interests relate to the general availability of fuels for Historic Vehicles and we do not have a view on this question.

Q 5 - Do you agree that introducing E10 in 2021 and providing industry and motorists with at least six months' notice and a two months' implementation period is sufficient to prepare for the change in fuel grades? If not, what alternative timelines would you suggest and why?

Yes Yes	No
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Additional information:

It seems likely that such timescales could be accommodated by Historic Vehicle motorists. The impact on our community would be limited to a requirement to purchase a more costly "Super" grade fuel and possibly in some cases drive further to find such fuel. The use of "Super" grade fuel is already advocated by some of our clubs.

Q 6 - Do you agree that the protection grade should apply to the 97+ octane super petrol grade at filling stations that supply at least one million litres of fuel in the last calendar year and supply at least two grades of petrol? If not, please explain why and provide any alternative suggestions.

<p>Yes</p> <p>YES</p>	<p>No</p>
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Additional information:

We welcome the proposal to continue a “protection grade” suitable for Historic and older vehicles and to commit to ensuring this remains available for the maximum period of 5 years, as proposed.

We agree that the 97+octane “Super” grade is the most appropriate grade to be assigned as the Protection Grade. We would request that when the precise amendment to the Motor Fuel Composition and Content Regulations 1999 specification for the “protection grade” comes to be approved, it will exactly reflect that for the “protection grade” which expired in 2016. It is important to note that at least some (if not all) of the Super grade fuels currently offered have an octane rating which exceeds 97, normally being 99 octane. These fuels are important to a number of our members with cherished vehicles, including some British executive saloons dating from the 1960s, which have an ongoing need for these high-octane fuels.

Q 7 - Do you agree that the protection grade should apply for the maximum period of five years after the introduction of E10 before being reviewed for any further extension? If not, please explain why and provide any alternative suggestions.

<p>Yes</p> <p>YES</p>	<p>No</p>
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Additional information:

We welcome the proposal to continue a “protection grade ” suitable for Historic and older vehicles and to commit to ensuring this remains available for the period of 5 years, which we recognise is the maximum possible.. The Consultation itself notes that “[classic and cherished] vehicles generally remain in the vehicle parc long-term as very few are scrapped” That may reasonably be expected still to be the case at the end of the 5 year period. The Federation consequently expects to be pressing for this “protection grade” remains in place at the end of this period.

Note also our comment upon the precise specification of the “protection grade” in the answer to Question 6.

Q 8 - Do you agree that short term derogations are required to ensure fuel supply resilience can be maintained. If you do not agree, please set out the reasons why?

Yes	No
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Additional information:

If derogations are required they must not prejudice the ongoing availability of E5 fuels. It is important to a proportion of our members that there be a continuing supply of "Super" grade fuel, as described in the answer to Question 6 in all the areas in which it is currently available.

Q 9 - What are likely scenarios in which a derogation may be required?

Response:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 10 - Are the duration, process and reporting elements of the derogations appropriate, and if not, what changes would you like to see and why?

Yes

No

Additional information:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 11 - Is the classification of a fuel supplier appropriate for the application of derogations and if not, what would you suggest?

Yes

No

Additional information:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 12 - Do you agree with the proposed wording for the E10 labelling? If not, why not and what alternative would you suggest?

Yes

YES

No

Additional information:

The wording seems appropriate. Our own advice to members would be that the Protection Grade should be the first choice for petrol-fuelled Historic Vehicles, which will generally not be suitable for E10.

Q 13 - Do you have further comments or suggestions for communicating the E10 compatibility message?

Additional information:

We are able to communicate this change via our network of Clubs, Museums, and individual members. This proposal has been widely publicised in the motoring press to date and further communication and warning notices at the pump seem the only possible additional measures.

Call for Evidence - Implications of an E10 introduction for other policy mechanisms

Q 14 - Would an increase in RTFO targets, alongside or subsequent to an introduction of E10, deliver additional GHG savings from the scheme?

Yes

No

Reasoning/ supporting evidence:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 15 - Would you be supportive of such a change?

You may wish to consider the level of any increase and the timing of it within your answers. Please provide any evidence you may have to support your response.

Yes

No

Additional information:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 16 - Do you expect any other risks or potential impacts of such a change other than the ones listed in this call for evidence?

Yes

No

Additional information:

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 17 - Please provide any evidence you have on the potential impacts of continuing the GHG saving obligation beyond 2020. We are interested in evidence relating to costs and GHG savings as well as wider impacts on the industry.

If the targets were to continue, do you have any views on:

- a. Which measures should be rewarded with GHG credits? For example, should UERs continue to be included?**
- b. The level of the obligation, i.e. should it remain at 6%?**
- c. Any other changes to the system you would like to propose.**

Summary response:

Point a –

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Point b –

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Point c –

Our interests relate to the availability of fuels for Historic Vehicles and we are do not have a view on this question.

Q 18 – Please use this space to add any additional comments, including questions raised in the Impact Assessment.

Additional comments: