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Via email: CO2RegulationGP@dft.gov.uk

CO₂ Regulation Green Paper Consultation
Great Minister House
33 Horseferry Road London
SW1P 4DR

22nd September 2021

Dear Sir or Madam,

**Response to Department for Transport Consultation on a new CO₂ emissions
regulatory framework for all newly sold road vehicles in the UK**

UKPIA represents the eight main oil refining and marketing companies operating in the UK. The UKPIA member companies – bp, Essar, Esso Petroleum, Petroineos, Phillips 66, Prax Refining, Shell and Valero – are together responsible for the sourcing and supply of petroleum products meeting over 85% of UK inland demand, accounting for a third of total primary UK energy.

This secure supply of affordable energy keeps the UK economy moving, with the sector also supplying feedstocks for the petrochemicals sector and specialised non-energy products such as lubricants, bitumen for use in road surfacing, and graphite for use in electric vehicle batteries and as electrodes in steel and aluminium manufacture.

The sector, therefore, has an opportunity to be at the heart of an orderly and just transition to a Net-Zero economy. By reinventing itself, using its extensive resources to decarbonise its activities and products, the sector has an important role also in future supply of new transport energy vectors and technologies such as hydrogen, batteries, and low carbon and climate-neutral fuels.

UKPIA is supportive of the Department for Transport's (DfT) objective to decarbonise transport in the UK as part of the UK's ambition to achieve net zero emissions by 2050 and firmly believes that a technology diverse approach to decarbonising transport is needed for the UK to meet its 2050 net zero objective. Such an approach provides scope for innovation, access to mobility for all and maintains a level of consumer choice. Low carbon liquid fuels and hydrogen are also energy vectors that will play a role in decarbonising UK transport, and offer opportunities for equivalent climate neutral impacts to those of battery electric vehicles.

Policies should focus on the ends of greenhouse gas emission reduction, not prescribe the means to achieve it. The chosen approach must look past tailpipe emissions of vehicles and incorporate a regulatory framework that captures the lifecycle emissions of the vehicle, with the overarching objective to achieve the biggest overall net reduction in GHG emissions.

UKPIA is grateful for the opportunity to respond to the Consultation on a new CO₂ emissions regulatory framework for all newly sold road vehicles in the UK. We welcome continued

engagement with the Department for Transport regarding the decarbonisation of mobility in future. Our responses to the questions posed in the consultation are given in Attachment 1.

Yours sincerely,

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