The Rt Hon Grant Shapps MP Secretary of State for Transport of the United Kingdom Department for Transport 33 Horseferry Rd London SW1P 4DR

21 January 2021

RE: The transition to zero-emissions vehicles

Dear Secretary of State,

As asset owners based in the UK, we are calling for the Government to implement an early phaseout date for internal combustion engine vehicles.

Climate change is recognised as the most significant global risk facing investors. For our beneficiaries, it threatens their livelihoods, their retirement savings, their health, their quality of life. Even a short delay in implementing the necessary policies increases the likelihood of a disorderly transition, threatening beneficiaries' savings and the resilience of the financial system.

As one of the highest emitting sectors in the UK, decarbonising road transportation is an urgent priority. We strongly welcome the leadership the UK has shown in committing to a 2030 sales ban on petrol and diesel cars in the UK.

As important as the date of the sales ban is the policies underpinning the transition to zeroemissions vehicles (ZEVs). We recommend the Government integrates the following key principles in its ICE phase-out planning and Transport Decarbonisation Plan:

- 1. **Price-parity:** Consumers need to be incentivised to purchase ZEVs today, yet price-parity is not expected between electric vehicles (EVs) and traditional vehicles until the mid-2020s. A combination of tax incentives, subsidies and grants are needed to ensure consumers are not penalised for making sustainable choices. Similar incentives will be required to encourage commercial uptake of zero-emission heavy goods vehicles (HGVs).
- 2. **Smooth uptake:** Introduce a rising mandate for the sales of zero emissions vehicles, which would reach 100% of sales by 2030.
- 3. **Expanded charging infrastructure:** Expanding the charging network is a prerequisite for building consumer confidence in EVs. Public funding will be needed for charging stations in sparsely populated regions, and private finance should be relied upon where possible.
- 4. Alternatives to car ownership: A like-for-like switch from traditional vehicles to EVs is not desirable, considering the carbon cost of EV production. Car sharing and other alternatives can reduce consumer costs and improve quality of life, and should be incentivised.
- 5. **Just transition:** The Transport Decarbonisation Plan should set out how autoworkers and related service providers will be protected, give details of retraining to be provided, and tackle the affordability of ZEVs for low-income groups and small businesses in the road haulage sector.

6. **Respect human rights:** EVs sold in the UK should be subject to due diligence requirements to ensure increased UK demand for certain materials does not contribute to human rights abuses.

As the hosts of COP26, the decisions made by the UK on its domestic decarbonisation efforts will have repercussions around the world, and will have a disproportionate weight in our ability to achieve net zero emissions by 2050 and protect our beneficiaries from the worst effects of climate change, both on their savings and on their lives.

Yours sincerely,

Rachel Elwell

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