Department for Transport

Increasing the Uptake of Eco-driving Training for Drivers of Large Goods Vehicles and Passenger Carrying Vehicles: Consultation Document

March 2010

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Contents

1. Introduction

1.1 The Department for Transport (DfT) is considering options to achieve a 90 per cent uptake of eco-driving training for drivers of Large Goods Vehicles (LGVs) and this consultation document invites views that will help inform this. It also considers whether a similar approach should be adopted for drivers of Passenger Carrying Vehicles (PCVs). This consultation document does not make specific amending proposals which would be the subject of a separate consultation if necessary.

Who should read this consultation document?

1.2 The following persons will have an interest in this document:

- Any LGV and PCV drivers;
- Any LGV and PCV drivers who are subject to the Driver Certificate of Professional Competence (Driver CPC);
- Any road haulage or road passenger transport operator or agency who employs LGV or PCV drivers;
- Any LGV and PCV training providers, or potential training providers;
- Freight customers; and
- Anyone else with an interest in the carriage of freight or passengers by road, or the carbon performance of road vehicles in general.

Purpose – why is action to increase the uptake of eco-driving training necessary?

1.3 The Government's *Carbon Reduction Strategy for Transport, Low Carbon Transport: A Greener Future*, was published in July 2009 and considered a wide variety of measures to cost-effectively reduce emissions from UK transport. The Strategy set out that emissions from freight movements stem primarily from the road sector, with LGVs representing 20 per cent of total domestic transport greenhouse gas emissions. The Strategy also highlighted that, with 68 per cent of road freight movements (measured by tonnes lifted) being within the same region and with no viable mode shift option, road transport would continue to play a vital role in the transport of

goods. Focusing our policies on reducing emissions from road freight is therefore important.

1.4 Our preliminary analysis showed that, if 90 per cent of LGV drivers were eco-driving trained and continued to drive in that manner, we could save up to 600,000 tonnes of CO_2 per year and £300 million in fuel costs for the industry per year.[1] As part of its carbon reduction strategy for transport, the DfT therefore committed to exploring how to achieve this 90 per cent uptake of eco-driving courses, including whether making eco-driving training a mandatory part of the periodic training undertaken every five years by professional drivers to retain the EU Driver Certificate of Professional Competence will help us do this.

1.5 Whilst there is some eco-driving training undertaken, a 2009 study of the eco-driving training market commissioned by the DfT found that currently only around 23 per cent of operators have had their drivers eco-driving trained, and that uptake of eco-driving training was highest for large fleet operators.

1.6 Eco-driving training is already a voluntary, eligible course for periodic training in the Driver CPC syllabus for both LGV and PCV drivers. Driver CPC for PCV drivers commenced in September 2008. However, early analysis of the first year of Driver CPC for PCV drivers indicates that only around 12 per cent of periodic training undertaken for Driver CPC to date was classified as eco-, or eco-safe, driving training.

1.7 Driver CPC for LGV drivers commenced in September 2009, and there is not yet sufficient data to evaluate the current take-up of eco-driving courses in the periodic training amongst LGV drivers. However, we anticipate that, given the relative similarities between the LGV and PCV market, without further action LGV drivers would undertake eco-driving courses under Driver CPC at about the same rate as PCV drivers.

Process and methodology

1.8 DfT Central, working with the Driving Standards Agency (DSA), is leading the consultation. Initial informal views on the principle of increasing the uptake of eco-driving training for LGV drivers, including through making eco-driving courses a mandatory component of the periodic training for Driver CPC, have been sought from the DfT's Logistics Sounding Board, an industry steering group comprising trade associations, operators and freight customers (purchasers of freight services). We have also sought views from the Department of the Environment in Northern Ireland, the Welsh Assembly Government, the Scottish Government and Skills for Logistics. These views have informed the content of this consultation. We will continue to seek views and review progress with these stakeholders.

1 At 2009 prices.

1.9 The consultation is informed by *Low Carbon Transport: A Greener Future*, the Safe and Fuel Efficient Driving (SAFED) 2009 Impact Assessment and the Freight Best Practice (FBP) 2009 Impact Assessment, both undertaken by Databuild on behalf of the DfT. The consultation will also be informed by ongoing research commissioned by the DfT to assess the longevity of eco-driving training benefits, and the DSA in co-operation with industry stakeholders will be evaluating the effects of introducing the Driver CPC scheme.

Policy considerations

1.10 In determining future policy, the DfT is currently considering a number of options to achieve a 90 per cent uptake of eco-driving training for LGV drivers. These are:

- **Option 1:** No change. This is the baseline against which other options are assessed. Eco-driving training continues to be undertaken on a voluntary basis, and the commercial pressure to reduce fuel costs is the primary driver for change.
- **Option 2:** Maintain current regulations but increase promotion of the benefits of eco-driving training, for example through increased marketing or improved best practice programmes.
- **Option 3:** Regulatory change. Our current thinking is that a cost-effective way of achieving a 90 per cent uptake of eco-driving training across LGV drivers and increased eco-driving training for PCV drivers is for eco-driving training to become a mandatory part of Driver CPC periodic training. The DfT and trade associations already promote the benefits of eco-driving training, and this suggests that promotion in isolation may not achieve the attainable benefits. Mandating eco-driving training is thought to be a cost-effective way to further reduce carbon emissions, as it utilises a regulatory framework that is already in place.

1.11 Following on from the success of the SAFED for Bus and Coach demonstration programme, launched by the DfT in 2009, we are also consulting on whether to make eco-driving training a mandatory component of periodic training for Driver CPC for PCV drivers (who are currently operating under the same regulations as LGV drivers in relation to Driver CPC). We are, therefore, also seeking your views on the inclusion of PCV drivers in Option 3.

1.12 We have asked a range of questions that will help us to understand the value of a regulatory approach in the context of better regulation. For example, we are seeking views on the number of hours the mandated training should take, the role of licensing and the regulation of pricing.

1.13 We are equally interested in how far voluntary approaches may deliver the benefits of eco-driving training, including the role of driver management in maintaining eco-driving training benefits and what we may be able to do to promote the management of driver behaviour.

How is the document structured?

1.14 The DfT wishes to capture views and experiences that will further inform the evidence-gathering phase of the process and the initial consideration of potential policy options. This consultation document invites comments throughout the following chapters:

- **Chapter 3** sets out the details of our carbon reduction strategy for transport in relation to eco-driving training, provides information about the current structure of Driver CPC in the UK and briefly sets out the approach towards Driver CPC adopted by some other EU states;
- **Chapter 4** sets out a suggested definition of eco-driving training for stakeholders to consider and discusses other factors that might need to be considered including management of drivers following eco-driving training;
- **Chapter 5** sets out the options currently under consideration; and
- **Chapter 6** summarises the questions asked throughout the document.

1.15 This consultation document also contains four annexes:

- **Annex A** sets out the Impact Assessment for the options raised in Chapter 5;
- **Annex B** is a list of consultees to whom this document is being sent;
- **Annex C** is the Code of Practice on Consultation; and
- **Annex D** is the Consultation Response Form, though you may wish to use another format with which to respond to us.

Devolved administrations

1.16 Meeting the requirements of the carbon budgets set in the Climate Change Act 2008, and driver training regulation contained in Driver CPC, is a reserved matter for the United Kingdom. The devolved administrations in Scotland, Wales and Northern Ireland are aware of the proposals and will have the opportunity to comment on the detail as part of the consultation process.

What will happen next?

1.17 A summary of responses, including the next steps, will be published at www.dft.gov.uk/consultations. Paper copies of the summary will be available on request.

1.18 If the responses to this initial consultation and associated work produce clear evidence to support change, the DfT will then consult on specific proposals. Based on the results, further research may be needed. Any further consultation will include a full impact assessment.

2. How to respond

2.1 The consultation began on **8 March 2010** and will close on **30 June 2010**. Please ensure that your response reaches us by that date.

2.2 If you would like further copies of this consultation document, it can be found at www.dft.gov.uk/consultations. If you would like alternative formats of this consultation, please contact us at the address below.

2.3 Please forward your responses to:

Freight and Logistics Division
Department for Transport
2/14 Great Minster House
76 Marsham Street
London SW1P 4DR
Tel: 0207 944 6170
Fax: 0207 944 6523
Email: freight@dft.gsi.gov.uk

2.4 When responding to the consultation and the questions presented within it, 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. When answering any questions, where possible please give figures on the estimated costs/benefits. This will help the DfT provide a detailed assessment of any future proposed changes.

2.5 The consultation document asks a range of questions in order to ensure the proposals are examined in as much detail as possible. It is not necessary to answer every question – you may prefer to focus on those questions that are most relevant to yourselves or the organisation that you are representing.

2.6 The consultation document has been sent directly to those listed at **Annex B**. If you have any suggestions of others who may wish to respond to the consultation, please contact us at the above address.

Disclosure of information

2.7 Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

2.8 If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

2.9 In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, in itself, be regarded as binding on the DfT.

2.10 The DfT will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

2.11 The consultation is being conducted in line with the Government's Code of Practice on Consultation. The criteria are listed at **Annex C**.

3. Background

3.1 This chapter presents background information in relation to eco-driving training. It sets out the details of our carbon reduction strategy for transport in relation to eco-driving training, provides information about the current structure of Driver CPC in the UK and briefly sets out the approach towards Driver CPC adopted by some other EU states.

Low Carbon Transport: A Greener Future

3.2 The DfT's Carbon Reduction Strategy for Transport, *Low Carbon Transport: A Greener Future*, was published in July 2009 alongside the UK Low Carbon Transition Plan. It sets out how Government intends to reduce greenhouse gas emissions from transport. Transport will make a major contribution to UK efforts to reduce CO_2 emissions, with the measures in the strategy reducing transport emissions by 14 per cent by 2020 compared with 2008.

3.3 Emissions from freight movements stem primarily from the road sector, with LGVs representing around 20 per cent of total domestic transport greenhouse gas emissions. Road transport will continue to play a vital role in the transport of goods. Focusing our policies on reducing emissions from road freight is therefore important.

3.4 Within *Low Carbon Transport: A Greener Future*, the DfT showed that increasing the uptake of eco-driving courses could have significant carbon saving potential. Our preliminary analysis showed that, if 90 per cent of LGV drivers were eco-driving trained, we could save up to 3 million tonnes of CO_2 over a five year carbon budgetary period (or 600,000 tonnes CO_2 of per year) and £300 million in fuel costs for the industry per year. We therefore committed to exploring how to achieve this 90 per cent uptake of eco-driving courses and then consult on the potential options for doing so, including whether making eco-driving a mandatory part of the Driver CPC will help us do this.

3.5 The DfT also sees this as an opportunity to improve the carbon performance of PCVs as well as LGVs, and, should Driver CPC remain the preferred option, we would consider requiring both categories of driver to undertake eco-driving training as part of their five-yearly Driver CPC periodic

training obligations. The Impact Assessment (**Annex A**) reflects this and includes a cost–benefit analysis for both LGV and PCV drivers.

Eco-driving training programmes

3.6 There are a range of eco-driving courses and training organisations in the market. An example of an eco-driving training programme is the Safe and Fuel Efficient Driving (SAFED) scheme launched by the DfT for LGV drivers in 2003. The one-day SAFED course involves a mix of classroom and on-the-road tuition and teaches the use of driving techniques such as better use of gears, keeping correct distances to avoid hard braking, and an overall awareness of fuel economy and road layout. The DfT initiated SAFED with funding to develop the training material, the trainer pool and to demonstrate the safety and fuel saving benefits to the freight industry. The training industry and the freight industry responded to this initiative with some 12,000 LGV drivers being trained to date under the scheme in England. In 2009 the SAFED programme was extended to bus and coach drivers.

3.7 There are over 1,500 training providers engaged in training LGV drivers in eco-, or fuel efficient, driving. Trainers may be micro-businesses or they may be employed by larger skills-based organisations. The diversity of this market is reflected in the range of courses that are on offer: training specialists may be associated with a branded training programme – such as the SAFED programme – while others construct their own training programme that combines fuel saving driving techniques with other elements that may be related to driving, such as safe or defensive driving, or may be combined with non-driving specific training, such as new regulations, loading or health and safety.

3.8 We recognise that trainers should determine how best to deliver the desired outcome from training. Given the diversity of the LGV and PCV driver training sector, training providers should be afforded the opportunity to continue to structure and provide training programmes that best suit their clients and their business needs, whilst meeting the desired outcomes from the training.

Driver CPC

3.9 Driver CPC was introduced across the European Community to maintain high driving standards and improve road safety (European Directive 2003/59/EC). All professional bus, coach and lorry drivers must hold a Driver CPC if they want to drive for a living, which is a separate qualification from a driver's vocational driving licence. Driver CPC for PCV drivers was implemented on 10 September 2008, and for LGV drivers it was implemented on 10 September 2009.

3.10 In the UK, Driver CPC regulations are contained in the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007 (as amended).[2] The regulations require all drivers to complete a minimum of 35 hours of periodic training every five years. For PCV drivers, the first five year period ends September 2013 and for LGV drivers the first five year period ends September 2014. The training will require attendance at courses but will not require drivers to take or pass further examinations after their initial exam. The minimum length of a training course is seven hours.

3.11 New LGV drivers gaining a C1, C1+E, C or C+E licence from September 2009 (PCV drivers from September 2008) and wishing to drive in a professional capacity must pass an initial qualification for the Driver CPC in addition to the theory and practical tests for a vocational driving licence. Any driver already holding a vocational licence at this date has 'acquired rights' to the Driver CPC and will not have to take the initial qualification. However, all current LGV and PCV licence holders will still have to undergo 35 hours of periodic training before the end of the first five year period. This will be necessary to keep their Driver CPC valid.

3.12 Driver CPC is designed to improve road safety, help the environment by reducing emissions and fuel use, provide greater professionalism and better career development for drivers, and help the road transport industry to recruit and retain staff and enjoy a better public image. As well as eco-, and eco-safe, driving training, courses on offer include the applications of regulations (eg working time regulations or use of tachographs), advanced training in rational driving (eg safe loading) and workplace accidents (eg personal safety).

3.13 European Directive 2003/59/EC prescribes the Driver CPC syllabus, and Member States have responsibility for approving accredited courses. In the UK, our initial qualification focuses on assuring standards through thorough assessment rather than regulated training. For periodic training, only courses that have been approved – and are being delivered by a training centre that has been approved – by the Joint Approvals Unit for Periodic Training (JAUPT) will count towards the periodic training requirement. All courses must relate to the CPC syllabus specified in the Directive, though to date the UK has not prescribed any topic, or class of topic, within the approved list of courses, and individual drivers (or their managers) may choose any combination of courses that fits their needs.

3.14 The DSA has regulatory responsibility for Driver CPC in Great Britain, and the Driver and Vehicle Agency (DVA) has regulatory responsibility in Northern Ireland. Training providers inform the DSA or DVA whenever training takes place. Professional drivers are required to carry a separate Driver Qualification card at all times which can be requested and checked by any EU enforcement agent. In the UK, this comprises the police and VOSA. For

2 SI No.2007/605.

drivers with acquired rights, they only require this card from 2013/14, when their acquired rights expire.

3.15 The DSA estimates that approximately 12 per cent of all periodic training undertaken in 2008–09 by PCV drivers could be categorised as eco-driving training. Driver CPC for LGV drivers commenced in September 2009, and there is not yet sufficient data to evaluate the current take-up of eco-driving periodic training amongst LGV drivers. However, we anticipate that, given the relative similarities between the LGV and PCV market, without further action LGV drivers would undertake eco-driving courses under Driver CPC at about the same rate as PCV drivers.

3.16 More information on Driver CPC can be accessed at Directgov: www.direct.gov.uk/en/Motoring/DriverLicensing/CaravansTrailersCommercialVehicles/DG_171186.

Driver CPC and other EU states

3.17 Making eco-driving training a mandatory component of Driver CPC Periodic Training is an approach that has been established in other EU states, notably the Netherlands. European Directive 2003/59/EC prescribes the Driver CPC syllabus. Member states have decided the degree to which the particular elements of the syllabus are mandatory in periodic training. Some member states have adopted an approach that leaves this to individual drivers and operators to determine (the current UK approach). Alternatively, others have chosen to mandate some or all topics in the syllabus that must be covered in each of the 35 hours of periodic training.

3.18 To illustrate, France and the Republic of Ireland mandate that periodic training courses must revisit the complete syllabus, while the Netherlands requires drivers to take at least seven hours of practical training (eco-driver training or road safety) in every 35 hours' CPC periodic training cycle. As Driver CPC implementation develops, we will assess the experiences of other EU states as we consider options for increasing uptake of eco-driver training.

4. Definitions

4.1 This chapter considers how eco-driving training could be defined. In the previous chapter we discussed the diversity of the LGV driver training market and recognised that there are many ways in which eco-driving training can be understood and packaged with other training products. This consultation is an opportunity to build a common understanding of what is meant by eco-driving.

4.2 There is no international standard or agreed national or EU definition of eco-driving training. Within the DfT's FBP programme, eco-driving training is defined as a recognised and proven style of driving that teaches driving techniques to optimise vehicle performance, including aerodynamic performance. This will reduce fuel consumption and carbon emissions.

4.3 However, there are likely to be a broad range of views about what this means in practice and, to help ensure that we can achieve our commitment to increase the uptake of eco-driving training, a common agreed definition is useful. The following suggested definition is based on our experiences of the SAFED programme: it is a very basic definition, albeit informed by experience, and there may be other ways to define eco-driving training that we would welcome your views on.

4.4 **Proposed definition:** based on the SAFED training programme, eco-driving training is defined as training that includes some or all of the following elements:

- how to improve aerodynamic performance;
- how to drive at efficient speeds;
- fuel efficiency and choice of gear;
- best practice for acceleration and braking; and
- anticipation of traffic and driving conditions.

4.5 We suggest that eco-driving training may have an element of theoretical training, but, based on our experience of SAFED, we suggest that it should have a strong element of practical, in-vehicle training. While this may be a higher-cost alternative to purely classroom-based learning, we believe that

this approach sustains longer and higher fuel and carbon-saving benefits for the industry.

4.6 There are other factors to consider when we think about what eco-driving training may look like. For example, some drivers will benefit from training in a laden vehicle. The degree to which other factors are encouraged or included in the definition of eco-driving training would need to be determined.

4.7 It is perceived that eco-driving improves general driver performance through enhanced anticipation of road activity, which, in turn, positively impacts upon safety. For this reason, we have included safety as a non-monetised benefit in the Impact Assessment (**Annex A**). And it is not surprising that many training courses are marketed as 'eco-safe'. Therefore we suggest that eco-safe driving training should be an eligible substitute for eco-driving training and that, for the purposes of this consultation, eco-driving and eco-safe driving are interchangeable. We feel that there should be some flexibility about what courses are called, and that naming should not preclude other subjects from being included in the training. For example, it seems sensible that safety could also be included in the title of an eco-driving training course. As a guide, the DSA defines eco-safe driving training as *a recognised and proven style of driving that contributes to road safety – whilst reducing fuel consumption and emissions*.

4.8 The longevity of the benefits of driving training may be determined by many factors, including driver attitude, the culture of the organisation and the role of management in driver performance. We have commissioned a study to investigate the longevity of eco-driving training benefits, which will inform our thinking on the regularity at which drivers should be re-trained. It is clear from initial results that longevity is likely to be less than five years. We are seeking your views on what factors determine the longevity of benefits and the regularity of retraining. We suggest that the Driver CPC timeframe for periodic training of five years is a minimum period of time before retraining in eco-driving.

Questions

Q1: Do you agree with the proposed definition of eco-driving training – and, if not, why not? What changes do you propose? Is there anything else that should be included in the definition?

Q2: How important a role do you think management of driver behaviour has in maintaining eco-driving training benefits and reducing carbon emissions more generally?

Q3: What can Government and non-Government organisations do to promote the improved management of driver behaviour?

5. Options

5.1 In this chapter we state the options currently under consideration, explaining why we believe making eco-driving training a mandatory part of Driver CPC is our preferred option. We are seeking your views on these options.

Option 1: No change

5.2 Option 1 is the baseline against which other options are assessed. Eco-driving training is currently undertaken on a voluntary basis. Eco-driving is included as part of the syllabus for vocational driving licence acquisition, in the Driver CPC syllabus and is promoted by trade associations, Skills for Logistics and the DfT (through the FBP programme). This option is the continuation of these policies and practices, without change.

5.3 The current level of eco-driving undertaken in the sector is important in determining the baseline for any consequent policy intervention as well as demonstrating the degree to which the benefits have already been attained and the extent to which the industry is improving driver behaviour without introducing regulatory change.

5.4 In the LGV sector, a 2009 study of the eco-driving training market commissioned by the DfT[3] found that:

- Between 2007 and 2009, around 154,000 drivers (23 per cent of operators) undertook some form of eco-training, but to what level or standard is not known;
- Between 2007 and 2009, around 82,000 drivers (7 per cent of operators) undertook SAFED training;
- Of the drivers that received training, much of it was through internal delivery with no known quality assurance or known benefits; and
- Uptake was highest for large operators and, while there are reasonably high levels of awareness for small and medium size operators, the level of use amongst smaller fleets was low.

3 Databuild, SAFED Impact Assessment, 2010. To be published.

5.5 There could be a number of reasons why large firms are the primary users of eco-driving training. For example, training may be undertaken by small firms 'on the job' without any recognised processes, or there may be an information gap amongst small firms, a shortage of resources or competing priorities.

5.6 Taking the DfT's SAFED programme as indicative of industry trends, we have found that the rate of uptake of SAFED courses in 2009 increased from 7 per cent of operators in 2007 to 9 per cent by 2009.[4] This suggests that there is a growing awareness within the industry of the benefits of eco-driving training. However, the rate of uptake, notably amongst smaller fleets, is not at a sufficient pace to embed widespread uptake of eco-driving training across the industry.[5]

5.7 The scope for accessing small to medium firms is significant: 50 per cent of operators have one vehicle, accounting for 11 per cent of the national LGV fleet, and 43 per cent of operators have between two and ten vehicles, accounting for 36 per cent of the national LGV fleet.[6]

5.8 An important factor in considering the level of uptake of eco-driving training achieved through Option 1 is the recent introduction of the Driver CPC syllabus for both LGVs and PCVs. The syllabus mandates 35 hours of training over a five year period, and eco-driving is an eligible course for this certificate. A large range of types of courses are eligible for completing this certificate, with eco-driving just one option.

5.9 We believe that, with the introduction of Driver CPC, the uptake of eco-driving training is likely to increase – but, because the Driver CPC was only introduced in this sector in September 2009, the rate of uptake for LGV drivers, especially amongst small and medium firms, is not yet known.

5.10 Driver CPC for PCV drivers commenced in September 2008, and we do have an early indication of the uptake of eco-driving training within that sector. This early analysis of the first year for PCV drivers indicates that around 12 per cent of periodic training undertaken for Driver CPC was classified by the DSA as eco-, or eco-safe, driving training. This 12 per cent figure has a number of caveats:

a. It is based on a review of the number of drivers who have completed courses that include words such as eco-safe, defensive, SAFED or fuel efficient in the title.

4 Databuild, SAFED Impact Assessment, 2010. To be published.
5 Refer to report findings detailed at paragraph 5.4.
6 Department for Transport, Road Freight Statistics 2008 (2009).

b. There are a number of courses that are simply titled Driver CPC or some similarly non-descriptive name. These may include an element of eco-driving training but have not been included in the 12 per cent figure.

c. The total may include some LGV drivers, as they started periodic training on 10 September 2009. It would be difficult from the information currently available to split the number exactly between LGV and PCV drivers.

5.11 As Driver CPC continues over time, more evidence in relation to the uptake of eco-driving training courses for both LGV and PCV drivers will be obtained and will be included in any potential future consultation.

5.12 However, given the parallels between the PCV and LGV sectors and the broad range of other Driver CPC-eligible courses that are available, we anticipate, without Government intervention or wider industry support, a similar level of uptake of eco-driving training courses by LGV drivers as that indicated for PCV drivers without intervention by Government or industry. There is no evidence to suggest that the increase in eco-driving training amongst LGV drivers, expected with the introduction of Driver CPC in September 2009, will be greater than that experienced in the PCV sector.

5.13 On this trend, once all drivers have undertaken their 35 hours of training, only around 12 per cent of drivers a year will have undertaken eco-driving training, which suggests a maximum of 60 per cent will have taken an eco-driving course by the end of the five year period.

Questions

Q4: To what extent do you believe eco-driving training is currently being undertaken – and to what extent does this vary across small, medium and large firms? Please justify your answer, explaining why you believe this is the case.

Q5: To what extent do you believe that the rate of eco-driving training uptake will increase across small, medium and large firms in the future without additional action being taken by Government or wider support from industry? Please justify your answer, explaining why you believe this is the case.

Option 2: Increased promotion of the benefits

5.14 Option 2 builds on the no change approach by increasing the promotion of the benefits of eco-driving training, through increased marketing or improved best practice guidance through Government action alone or Government working in partnership with industry, but without introducing regulatory change.

5.15 This option has a significant advantage in that it may increase the uptake of eco-driving training amongst LGV and PCV drivers without operators and drivers having to adapt to regulatory change and the costs to regulators of ensuring compliance. A marketing programme of the benefits of eco-driving training or improved best practice guidance, for example, would be likely to be aided by the introduction of Driver CPC, with operators and drivers more engaged than previously as they consider what training to attend.

5.16 However, the level of success attributable to this option is difficult to assess given the possible range of marketing, best practice or potential funding interventions and the level of partnerships that can be fostered between Government and non-Government bodies, such as trade associations and skill sector organisations.

5.17 FBP is the DfT's flagship vehicle to promote freight efficiency programmes to the freight and logistics industry. The FBP 2009 Impact Assessment[7] found that in 2009:

- 26 per cent of LGV operators are aware of FBP, compared to 24 per cent in 2007; use of the programme has increased from 9 per cent in 2007 to 13 per cent in 2009. Guidance based on FBP is now also available through the FTA, which is used by at least 15 per cent of operators;
- Use is highest among large operators; consequently the programme has reached a proportion of fleets that account for 56 per cent of all vehicles in England;
- Generally the sector is positive about fuel efficiency and has close links to cost efficiency and business performance; however, there is a perception that there is not a great deal of potential to significantly reduce costs through implementing new or more measures; and
- There is potential to reduce carbon emissions from LGVs by three million tones CO_2 a year across the freight industry through implementing the measures promoted by FBP. The main obstacle to this being achieved is the perception within the sector that fleets will not benefit from the measures and have no need to take them.

5.18 These findings support the conclusions reached in Option 1 when discussing the uptake of eco-driving training. The broader issue of who in

7 Databuild, Freight Best Practice Impact Assessment, 2010. To be published.

the industry is most likely to respond to Government promotional programmes follows a similar pattern. We see significant benefits in partnerships with trade associations and skills sectors to promote benefits to industry. However, whilst Government-sponsored messages targeted at small businesses can be successful, the rate of uptake of Government-sponsored messages in the freight and logistics sector, notably amongst smaller fleets, is not currently at a sufficient pace to embed widespread uptake of eco-driving training across the industry.

Questions

Q6: If Option 2 is pursued, what promotional strategies do you suggest Government should consider, with particular focus on strategies aiming to reach smaller firms?

Q7: If Option 2 is pursued, what role do you think voluntary industry action, alone or in partnership with Government, should play in promoting the benefits?

Q8: To what extent do you think elements of Option 2 would be required should Option 3 be the accepted approach?

Option 3: Eco-driving as a mandatory part of Driver CPC

5.19 Option 3 introduces eco-driving training as a specific mandatory unit of periodic training for the Driver CPC for LGV and PCV drivers. This is our preferred option.

5.20 The DfT and trade associations already promote the benefits of eco-driving training, which suggests that promotion alone may not achieve the attainable benefits and indicates that a regulatory intervention may be appropriate. We considered a range of options that involved regulatory change and, after careful consideration, it is our view that the most appropriate regulatory change should be in relation to Driver CPC.

5.21 Below is a brief overview of alternative regulatory options considered, explaining our view as to why they were not considered to be appropriate. In addition to your views on Option 3, we are seeking your views on these alternative regulatory options.

To include eco-driving as a mandatory part of the practical element of the LGV driving test

5.22 Eco-driving is a topic in the EU standard for the syllabus for the driving test for new vocational drivers. Our theory and practical testing arrangements for new drivers currently validate the initial training standards and send a positive message about the benefits of eco-driving.

5.23 A regulatory option considered was the inclusion of eco-driving as a practical element of the LGV driver's test. Eco-driving could be included in the pass/fail element of the practical test, in addition to the theoretical component of the test, which already includes questions in relation to eco-driving.

5.24 The nature and content of our theory and practical tests, both for licence acquisition and for the CPC initial qualification, are kept under review. However, this option was not pursued on the grounds that it would not address already qualified drivers who comprise the large majority of the professional driving workforce and therefore have a limited impact on driver behaviour and would not sufficiently reduce emissions to meet the policy objective to make a major contribution to CO_2 reduction by 2022.

To include eco-driving as a pre-requisite for Traffic Commissioners' approval of Goods Vehicle Operator Licences

5.25 A regulatory option considered was whether the goods vehicle operator licensing regime, regulated by Traffic Commissioners, would offer a mechanism for increasing the uptake of eco-driving training. In particular, we considered whether it would be feasible or practical for an applicant operator to be required to provide proof that drivers employed or hired by them are eco-driving trained as part of their application, and that retention of suitably trained drivers should be a requirement for continued good repute.

5.26 This option was not pursued on the grounds that operator licensing focuses at the level of operator rather than driver, which reflects European legislation for the hire or reward sector and domestic legislation for the own account sector. It would also be an impractical burden to introduce such a level of requirement to the operator licensing regime, given that the driver community needs the flexibility to move across fleets and between operators, a situation also of benefit to operators.

To introduce a new scheme mandating eco-driving training

5.27 A regulatory option considered was the introduction of a new scheme mandating all LGV drivers to undertake eco-driving training on a periodic basis. A new regulatory scheme would include many features of the Driver CPC framework: periodic training, an approvals authority to approve training programmes, proof of having undertaken training, agreed exemptions and an enforcement approach.

5.28 We are concerned that the introduction of any new regulatory framework to make driving training compulsory would unnecessarily increase the regulatory burden for drivers and establish an administrative regime in parallel to the Driver CPC.

To mandate eco-driving training through Driver CPC

5.29 For these reasons, mandating eco-driving training through Driver CPC is thought to be a cost-effective approach for operators, drivers and administrators. This option utilises a regulatory framework that is already in place and does not increase the regulatory burden imposed upon operators, as drivers will be undertaking some form of training under Driver CPC in any case. Furthermore, this option does not result in taking drivers out of work for an extra day of training, but instead will replace other training with eco-driving training. Fuel optimisation, including eco-driving, training is also an explicit rationale of the EU Directive, which is not the case for licence testing. There will be costs associated with system development and DSA case handling, but eco-driving training will bring benefits to operators in terms of fuel and cost savings. The Impact Assessment at **Annex A** shows fuel-saving benefits to LGV fleet operators over an eight year period equal to £1,394m and carbon benefits equal to £150m.

5.30 We envisage implementing the regulatory change by mid-2011, to take effect within the first five-year Driver CPC period of training (September 2009 to September 2014).

To extend mandatory eco-driving through Driver CPC to PCV drivers

5.31 Following on from the success of the SAFED for Bus and Coach demonstration programme, launched by the DfT in 2009, we are also seeking your views on whether to make eco-driving training a mandatory component of Driver CPC for PCV drivers (who are currently operating under the same regulations as LGV drivers in relation to Driver CPC). The inclusion of PCV drivers would increase the driving standards of PCV drivers and reduce fuel use and emissions in the bus and coach sector.

5.32 Were we to exclude PCV drivers, we would need to address those drivers who hold both LGV and PCV entitlements. This may be difficult given that, in this context, the Directive does not distinguish between drivers of goods and passenger-carrying vehicles for periodic training purposes, and many existing bus drivers will hold category C1 entitlement granted as a consequence of passing the category B driving test before 1997. We do not have a mechanism to identify whether such drivers are working professionally as PCV or LGV drivers when taking their periodic training and may themselves alternate from one to the other during the five year periodic training period.

5.33 We are also seeking your views on the level to which the parameters and structure of eco-driving should be prescribed. We suggest that Option 3 may include the elements set out below. We are seeking your views on any of these elements, including alternative options. We suggest that, should eco-driving training be a specific mandatory part of Driver CPC, it would:

a. apply equally to LGV and PCV drivers;

b. consist of practical and in-vehicle training, with theoretical training a subset of the practical training;

c. include the following features:

- improved aerodynamic performance;
- efficient speeds;
- choice of gear;
- acceleration and braking; and
- anticipation of traffic and driving conditions;

d. consist of seven hours and be undertaken in one training day;

e. apply to periodic training only;

f. be retaken each five year period; and

g. be consistent with all other features of the Driver CPC regulations, including in relation to enforcement, exemptions and penalties.

5.34 We recognise that the cost of practical, in-vehicle training will be a higher-cost alternative to purely classroom-based learning. However, as stated earlier, we believe that the practical element of eco-training will sustain larger fuel savings for operators.

5.35 When discussing the definition of eco-driving, we suggested that eco-safe driving training should be an eligible substitute to eco-driving training and that eco-driving and eco-safe driving are interchangeable concepts. We suggest that this approach should extend to Driver CPC: eco-safe, as opposed to purely eco-driving training, should be an eligible substitute for eco-driving training. Safety may also be included in the title of an eco-driving training course.

5.36 We are also seeking views on the structure of the training day and the extent to which it should be prescribed. Based on our experience, a suggested programme may involve initial assessment of a trainee's driving style, reassessment to record improvements in driving technique and, where possible, actual fuel consumption. A recommended method may include the following features:

- The trainee receives theoretical training;
- The trainee is assessed on his/her driving abilities by the instructor;
- The trainee receives a debrief on his/her performance and driving style;

- The instructor delivers a demonstration drive tailored to the trainee's training objectives; and
- The trainee is given the opportunity to demonstrate the techniques learned, along the original assessment route with ongoing input and guidance from the instructor, where necessary.

5.37 The length of training should also be considered. We have already seen that Driver CPC requires periodic training to be undertaken in blocks of no less than seven hours. We suggest that this length of time – coupled with a practical element of in-vehicle training – will create substantial benefits for the environment and industry when repeated on a periodic basis.

5.38 We believe that sharing in-vehicle training sessions (eg in turn, one trainee drives, one watches) is an appropriate training method.

5.39 We suggest that LGV and PCV drivers who have met their 35 hours' periodic training obligations under the Driver CPC regulations prior to the introduction of the suggested amendments should be exempt from these requirements in that five-year period for periodic training. However, we recognise that there will be some issues to resolve, such as drivers who have booked and paid for all their training when the changes are made and have not undertaken or booked eco-driving training.

Questions

Q9: Do you agree that eco-safe driving training should be included as an eligible substitute for eco-driving training – and, if not, why not?

Q10: Do you agree with the inclusion and/or substance of the recommended structure proposed in relation to eco-driving training – and, if not, why not?

Q11: If Option 3 is pursued, do you agree with the proposed elements that eco-driving training should consist of – and, if not, why not?

Q12: If Option 3 is pursued, do you agree that eco-driving training should consist of seven hours and be undertaken in one training day – and, if not, why not?

Q13: If Option 3 is pursued, do you agree that eco-driving training should only be mandated for periodic training, or should it be extended to the initial Driver CPC qualification?

Q14: If Option 3 is pursued, do you agree that eco-driving training should be mandated to include PCV drivers – and, if not, why not?

Q15: If Option 3 is pursued, would you consider an enforced price cap on the amount charged for eco-driving training, or periodic training generally, to be appropriate – and, if so, why?

Q16: Which is your preferred option: Option 1, Option 2, Option 3, or none of these options?

Q17: If none of the options proposed in the consultation document is your preferred option, what alternative option(s) should we consider – and, if so, why?

Q18: Do any of these options have an impact on the competitiveness of UK industry – and, if so, why?

6. Consultation questions

NOTE: When answering each of the questions in this section, please, where possible, provide figures relating to the costs and benefits related to your response. These figures will be used when any potential future policies are being considered.

6.1 It would be helpful if, when you reply, you could focus your response on the following questions, though we would, of course, also be pleased to consider any other comments that you may wish to make.

Definition of eco-driving training

Q1: Do you agree with the proposed definition of eco-driving training – and, if not, why not? What changes do you propose? Is there anything else that should be included in the definition?

Q2: How important a role do you think management of driver behaviour has in maintaining eco-driving training benefits and reducing carbon emissions more generally?

Q3: What can Government and non-Government organisations do to promote the improved management of driver behaviour?

Option 1: No change

Q4: To what extent do you believe eco-driving training is currently being undertaken – and to what extent does this vary across small, medium and large firms? Please justify your answer, explaining why you believe this is the case.

Q5: To what extent do you believe that the rate of eco-driving training uptake will increase across small, medium and large firms in the future without additional action being taken by Government? Please justify your answer, explaining why you believe this is the case.

Option 2: Increased promotion of the benefits

Q6: If option 2 is pursued, what promotional strategies do you suggest Government should consider, with particular focus on strategies aiming to reach smaller firms?

Q7: If option 2 is pursued, what role do you think voluntary industry action, alone or in partnership with Government, should play in promoting the benefits?

Q8: To what extent do you think elements of option 2 would be required should option 3 be the accepted approach?

Option 3: Driver CPC

Q9: Do you agree that eco-safe driving training should be included as an eligible substitute for eco-driving training – and, if not, why not?

Q10: Do you agree with the inclusion and /or substance of the recommended structure proposed in relation to eco-driving training – and, if not, why not?

Q11: If Option 3 is pursued, do you agree with the proposed elements that eco-driving training should consist of – and, if not, why not?

Q12: If Option 3 is pursued, do you agree that eco-driving training should consist of seven hours and be undertaken in one training day – and, if not, why not?

Q13: If Option 3 is pursued, do you agree that eco-driving training should only be mandated for periodic training, or should it be extended to the initial Driver CPC qualification?

Q14: If Option 3 is pursued, do you agree that eco-driving training should be mandated to include PCV drivers – and, if not, why not?

Q15: If Option 3 is pursued, would you consider an enforced price cap on the amount charged for eco-driving training, or periodic training generally, to be appropriate – and, if so, why?

General

Q16: Which is your preferred option: Option 1, Option 2, Option 3, or none of these options?

Q17: If none of the options proposed in the consultation document is your preferred option, what alternative option(s) should we consider – and, if so, why?

Q18: Do any of these options have an impact on the competitiveness of UK industry – and, if so, why?

Impact Assessment (Annex A)

Q19: Do you agree with the draft Impact Assessment (Annex A) – and/or can you help us to quantify more precisely the estimated costs and benefits?

Q20: Do you agree with the estimates provided for average distance driven and fuel used for LGV and PCV drivers? Please note that the estimates used are annual averages for drivers across all types of vehicle.

Q21: Do you agree that eco-driving training has not been widely taken up by small firms in the past – and/or can you help us to quantify the number of small firms that have undertaken eco-driving training?

Q22: Does your organisation operate any driver management systems? What costs/benefits have resulted in driver management systems?

Q23: What impact do you think Option 2 would have on the uptake of eco-driving training? Is it feasible that additional promotion would attract small operators and we would reach our 90 per cent target – if so, by when?

Q24: Are there alternative approaches for smaller firms that would not materially affect the potential benefits from the policy?

Consultation criteria

Q25: Do you consider this consultation has been conducted in accordance with the Code of Practice on Consultation (Annex C)?

The last date for the receipt of responses to this consultation is: 30 June 2010.

Annex A:
Impact Assessment

Summary: Intervention and Options

Department /Agency:	Title:	
Department for Transport	**Impact Assessment of regulating eco-driver training as a mandatory part of Driver CPC**	
Stage: : Consultation	**Version:** Final Draft	**Date:** 28 January 2010
Related Publications:		

Available to view or download at:
http://www.dft.gov.uk/consultations/open/

Contact for enquiries: James Williams **Telephone: 020 7944 6170**

What is the problem under consideration? Why is government intervention necessary?

Climate change is caused by the emission of greenhouse gases into the atmosphere. An externality exists as those who emit do not have to directly bear the full costs of their actions. In 2006, buses and Large Goods Vehicles (LGVs) produced around four per cent and 20 per cent of total UK CO_2 emissions from domestic transport respectively. 'Low Carbon Transport: A Greener Future' considered a variety of measures to cost-effectively reduce emissions with eco-driving in the freight and bus sectors.

What are the policy objectives and the intended effects?

Our policy objective is to make a major contribution to UK efforts to reduce CO_2 emissions by increasing uptake of eco-driving courses amongst LGV and Passenger Carrying Vehicle (PCV) drivers. Preliminary analysis suggests this could save up to 600,000 tonnes of CO_2 in the LGV sector per year if 90 per cent of drivers were eco-driving trained. The proposed approach is therefore to consider how to reach a 90 per cent uptake to cost-effectively reduce CO_2 emissions from LGV and PCVs.

What policy options have been considered? Please justify any preferred option.

Option 1: No change. Eco-driving is undertaken on a voluntary basis as part of training that is already undertaken. **Option 2:** Maintain current regulations but increase promotion of the benefits of eco-driving training. The amount of investment in such an option has not been proposed and is discussed at a broad level only. **Option 3** (preferred): Eco-driver training as a mandatory part of the Driver Certificate of Professional Competence (Driver CPC) for LGV and PCV drivers. This utilises a regulatory framework that is already in place and is expected to be more effective than promotion alone.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

A continuous record of the uptake of eco-driver training will be maintained by the Driving Standards Agency (DSA). This will form the basis of review by the Department on an annual basis.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

..... Date: 3 March 2010

Summary: Analysis and Evidence

Policy Option: 2	Description: Maintain current regulations but increase promotion of the benefits of eco-driving training.

COSTS

ANNUAL COSTS	
One-off (Transition) **Yrs**	Description and scale of key monetised costs by 'main affected groups'
£ 0	Total monetary costs have not been identified for this option at this stage as there are several possible ways to increase promotion.
Average Annual Cost (excluding one-off)	
£ Not available	**Total Cost** (PV) **£ Not available**

Other **key non-monetised costs** by 'main affected groups'

The main cost of this option would be borne by operators who chose to send their drivers on practical, in-vehicle eco-driving training rather than cheaper classroom-based training.

BENEFITS

ANNUAL BENEFITS	
One-off **Yrs**	Description and scale of **key monetised benefits** by 'main affected groups'
£	Benefits have not been monetised at this stage as the change in uptake that might be achieved by increased promotion is unknown.
Average Annual Benefit (excluding one-off)	
£ Not available	**Total Benefit** (PV) **£ Not available**

Other **key non-monetised benefits** by 'main affected groups'

This option would provide fuel saving benefits to operators who chose to send their drivers on eco-driving training and hence reduce carbon emissions, and also improve safety and air quality. The extent of improvement has not been estimated.

Key Assumptions/Sensitivities/Risks

This is a non-regulatory option and the questions below are answered in line with this.

Price Base Year	Time Period Years	**Net Benefit Range** (NPV) **£ Not available**	**NET BENEFIT** (NPV Best estimate) **£ Not available**

What is the geographic coverage of the policy/option?			United Kingdom	
On what date will the policy be implemented?			August 2011	
Which organisation(s) will enforce the policy?			Not applicable	
What is the total annual cost of enforcement for these organisations?			£ 0	
Does enforcement comply with Hampton principles?			Yes	
Will implementation go beyond minimum EU requirements?			No	
What is the value of the proposed offsetting measure per year?			£ Not applicable	
What is the value of changes in greenhouse gas emissions?			£ Not available	
Will the proposal have a significant impact on competition?			No	
Annual cost (£-£) per organisation (excluding one-off)	Micro	Small	Medium	Large
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices) (Increase - Decrease)

Increase of £ 0 Decrease of £ 0 **Net Impact** **£** 0

Key: **Annual costs and benefits: Constant Prices**

Summary: Analysis and Evidence

Policy Option: 3	Description: Eco-driving training as a mandatory part of the Driver CPC for LGV and PCV drivers.

COSTS

ANNUAL COSTS	
One-off (Transition) **Yrs**	Description and scale of key monetised costs by 'main affected groups'
£ None identified	The main affected groups are LGV and PCV operators or drivers
Average Annual Cost (excluding one-off)	Cost to operators of additional practical training: £27m (all figures in this box in present value)
£ 3.7m	**Total Cost** (PV) **£ 27m**

Other **key non-monetised costs** by 'main affected groups'

Operators will not benefit from the training substituted for eco-driving training. If eco-driving were to be mandated as part of the Driver CPC, there will be costs associated with system development and DSA handling costs. There may be an adverse affect on trainers who have already developed CPC courses.

BENEFITS

ANNUAL BENEFITS	
One-off **Yrs**	Description and scale of **key monetised benefits** by 'main affected groups'
£ None identified	Fuel savings for LGV and PCV operators: £438m
Average Annual Benefit (excluding one-off)	Reduced carbon emissions: £143m (all figures in this box in present value)
£ 83m	**Total Benefit** (PV) **£ 574m**

Other **key non-monetised benefits** by 'main affected groups'

Given that eco-driving training raises the general standard of driving, it is anticipated that road safety will improve, which may also lead to reduced insurance costs. There is likely to be a fall in local air pollutants due to the reduction in fuel use and changes to braking patterns.

Key Assumptions/Sensitivities/Risks

The expected level of eco-driving without regulation is a key assumption. Another key assumption is the benefit attributed to eco driving training, which we are currently conducting a study to ascertain. There is a risk that the cost of eco-driving training will increase significantly with the proposed regulatory change.

Price Base Year **2009**	Time Period Years **8**	**Net Benefit Range** (NPV) **£ £72m–£547m**	**NET BENEFIT** (NPV Best estimate) **£ 547m**

What is the geographic coverage of the policy/option?			United Kingdom	
On what date will the policy be implemented?			August 2011	
Which organisation(s) will enforce the policy?			DSA/DVA	
What is the total annual cost of enforcement for these organisations?			£ No additional	
Does enforcement comply with Hampton principles?			Yes	
Will implementation go beyond minimum EU requirements?			Yes	
What is the value of the proposed offsetting measure per year?			£ N/A	
What is the value of changes in greenhouse gas emissions?			£ 21m per year	
Will the proposal have a significant impact on competition?			No	
Annual cost (£–£) per organisation (excluding one-off)	**Micro**	**Small**	**Medium**	**Large**
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices) (Increase - Decrease)

Increase of £ 0 Decrease of £ 0 **Net Impact** **£** 0

Key: **Annual costs and benefits: Constant Prices** **(Net) Present Value**

Evidence base (for summary sheets)

1 Introduction

1.1 This policy aims to help to tackle the problem of climate change caused by greenhouse gas emissions. An externality exists as those who emit do not have to directly bear the full costs of their actions. Transport accounts for around 21 per cent of UK greenhouse gas emissions. The Department's strategy to reduce emissions was published in *Low Carbon Transport: A Greener Future*. This considered a wide variety of measures to cost-effectively reduce emissions from UK transport.

1.2 Eco-driving in the freight sector was identified as a component of the overall strategy. In 2006, PCVs and LGVs produced around four per cent and 20 per cent of total UK CO_2 emissions from domestic transport respectively. There is some eco-driving training in these sectors but currently it is not believed to be at a high level. A mandatory training regime has recently been introduced for LGV and PCV drivers (described in the section on the No Change option) but eco-driving is only one of a large number of options that can fulfil the requirements. *Low Carbon Transport: A Greener Future* states that increasing the uptake of eco-driving courses may have significant carbon saving potential. We committed in the document to exploring how to achieve 90 per cent uptake of eco-driving courses and then consult on the potential options for doing so, including whether making eco-driving a mandatory part of the Driver CPC will help us do this.

1.3 Some operators have already embarked on various eco-driving training initiatives in order to reduce their fuel consumption. One form of driver training, until recently funded by the DfT, is the Safe and Fuel Efficient Driving (SAFED) programme. The concept of SAFED was developed with the aim of improving safety and fuel efficiency through better driving techniques, traditionally of LGV drivers. This has since been widened to other vehicle types, including Buses and Coaches in 2009.

1.4 Government intervention to increase eco-driving training for LGV and PCV drivers is premised on the relatively small uptake of eco-driving training amongst operators to date. Intervention is justified on the grounds that there are significant external benefits for society (carbon savings) but also significant private benefits for operators (fuel savings). There is a market failure as those who emit greenhouse gases do not have to directly bear the full costs of their actions. There is also the possibility that market failure is arising from imperfect knowledge of the fuel efficiency benefits of eco-driving training. While these benefits have been promoted by the DfT through the Freight Best Practice (FBP) programme and by trade associations (eg by the Freight Transport Association and the Road Haulage Association) there may nonetheless be an information gap, coupled with doubts in the industry as to the longer term benefits of training. These

doubts will, in time, be diminished with the release of the DfT study into benefits of eco-driving (the SAFED Longevity of Benefit study), but it is hoped that this intervention will address both the underlying imperfect knowledge and external cost factors.

1.5 In 2007 a feasibility study was undertaken to determine whether SAFED could be applied to the bus and coach sector. The study indicated that:

- the majority of bus drivers showed between a 5 per cent and 15 per cent fuel saving (with an average of 12 per cent);
- there was an average 40 per cent reduction in gear changes; and
- there was a 60 per cent reduction in safety-related faults.

1.6 Using this evidence as indicative of other eco-driving training programmes, it is possible to illustrate the potential fuel savings from an increase in uptake of eco-driving training. On average, each bus operating on a local bus route consumes around 27,000 litres of fuel per year. A 10 per cent saving in fuel from an eco-driver training programme therefore translates into around 2,700 litres of fuel which is equal to around seven tonnes of CO_2. If this saving was achieved for all 36,000 buses operating on local services in England, this would equate to a saving of around 0.3m tonnes of CO_2 per year. However, it is recognised that continued savings may reduce over time, particularly if retraining is not regularly undertaken.

1.7 A key means by which Government subsidises bus travel is through the Bus Service Operators Grant (BSOG). This grant is a payment to bus operators which offsets a high proportion (slightly less than 80 per cent) of the fuel duty cost incurred. BSOG has traditionally increased in line with fuel duty but since April 2009 bus operators have been required to achieve a minimum improvement in fuel efficiency in order to qualify for a higher level of BSOG (and in the medium-to-long term it is intended that BSOG will be mainly based on passenger numbers rather than fuel consumption).

1.8 With these changes to BSOG, subsequent (and future) increases in the cost of fuel will further increase the incentive on bus operators to conserve fuel, making the private case for undertaking eco-driving training higher. However, given the wider social benefits of reduced carbon emissions it will help to contribute towards our carbon reduction policies. It will ensure this training is rolled out towards PCV drivers earlier than otherwise would have been.

1.9 European Directive 2003/59/EC governing Driver CPC provides an existing international framework within which this regulatory change may be undertaken.

1.10 This Impact Assessment (IA) presents the costs and benefits of the available options in order to set out the available evidence. First, the baseline

situation is described; this is what is expected to happen if no action is taken. This then allows us to compare the two proposed options to the baseline to show the likely costs and benefits of action. Several estimates have been made to present the most likely situation using the available evidence. To increase confidence in the methods employed we would like to invite comments (including supporting or contradicting data) on the following estimates (Table 1) used in the IA. These figures relate to entire industry averages.

Table 1: Key underlying estimates and outputs for comment	
Average distance driven by an LGV driver in a year	**60,100 miles**
Average distance driven by a bus and coach driver in a year	**42,000 miles**
Annual fuel used by the average LGV driver (current)	**29,500 litres**
Fuel saved by average LGV driver due to eco-driving training in the following year	**1,455 litres or around £1,700 worth of fuel**

2 Baseline – Option 1: No change

2.1 This option describes the situation if no action is taken, so that other options can be compared against it. The main characteristics of Option 1 are:

- The numbers of drivers in the two affected sectors.
- How many of them will be driving in an eco-friendly fashion without regulation.
- The amount of fuel the drivers will be using.
- The carbon intensity of the fuel.

2.2 We appraise the impact of the policy options for the current period of Driver CPC alone, as we believe the impact in future years will remain broadly similar (however, Option 3 is proposed to be implemented in perpetuity). As we assume the training has an impact for five years (though at a diminished rate in future years), the appraisal period covers up to 2018. For baseline data for the LGV sector we have used the DfT's National Transport Model[1] (NTM) to provide forecasts of LGV traffic kilometres and total fuel used for future years. Using the NTM ensures that the forecasts in this IA will be consistent with all the assumptions that are made for the model, such as fuel prices, GDP and future infrastructure levels.[2]

1 For more information on the National Transport Model see http://www.dft.gov.uk/pgr/economics/ntm/.

2 The NTM forecasts are for 2010, 2015 and 2025; data for other years is obtained by linearly interpolating between the forecast years (essentially assuming a straight line rate of growth to reach the next forecast year).

2.3 Local bus kilometres are assumed to be unchanged. Fuel consumption forecasts take into account a potential base uptake in eco-driving training programmes (discussed in detail below) with an average 10 per cent fuel saving per trained bus driver (diminishing over time until retrained after five years). It also takes into account projected increases in more fuel efficient buses into the bus fleet over time. Non-local bus and coach services do not claim BSOG and therefore we do not have access to the same data. We have therefore assumed for the purposes of this analysis that non-local services and coaches have a fuel efficiency equal to rural local bus services. Rural bus services tend to operate at more fuel-efficient speeds and in less congested areas, which better reflects non-local bus and coach operations. Rural services also tend to be made up of relatively older and more fuel-efficient buses than urban routes. We have assumed the rate of change in fuel consumption is the same for non-local as for local.

2.4 The carbon intensity of fuel is taken to be consistent with the IA produced for the carbon reduction strategy for transport,[3] which shows a decline as a greater percentage of biofuels is used. There is a fuel use penalty associated with biofuels (i.e. fuel efficiency reduces slightly); this is reflected in the fuel use numbers produced by the NTM.

2.5 We then use the data in Table 2 to calculate several other factors. We can calculate the average fuel efficiency in terms of miles per gallon or kilometres per litre implied by the LGV and PCV traffic and associated fuel use. Although this figure will be an overall average it allows us to calculate the average fuel used by a driver per year. To do this we also need the distance travelled per driver. To do this we have taken the LGV driver population from 2009 from the ONS labour force survey, which is 310,454.[4] For buses, fuel consumption data is taken from BSOG claims and distance travelled per bus from TSGB data on the total number of buses and coaches in GB (around 80,000). This provides us with an average distance travelled per LGV driver that year of 60,100 miles and of an average bus of around 67,500 km per year. We assume this does not change over time, which implies that the driver population will increase to reflect the increase in LGV and PCV traffic. Using this average mileage/kilometres, we are then able to calculate an average fuel consumption per driver or per vehicle (which decreases over time as efficiency improves but mileage is assumed to stay the same). These calculations produce the results in Tables 3 and 4.

3 This Impact Assessment can be found here: http://www.dft.gov.uk/pgr/sustainable/carbonreduction/.

4 To come>

Table 2: Baseline data

	LGV traffic	Fuel used by LGVs	Carbon intensity of fuel	Estimated bus and coach traffic	Assumed fuel consumption on bus and coach services
Source	NTM (billion km)	NTM (million litres)	Low Carbon Transport: A Greener Future (kg CO_2 per litre)	Assumed constant (billion km England only)	Calculated (million litres England only)
2008	29.94	9,289	2.56	5.4	1,704
2009	30.03	9,201	2.55	5.4	1,690
2010	30.12	9,113	2.54	5.4	1,677
2011	30.37	9,135	2.52	5.4	1,660
2012	30.61	9158	2.51	5.4	1,656
2013	30.85	9,180	2.50	5.4	1,656
2014	31.10	9,203	2.49	5.4	1,648
2015	31.34	9,225	2.47	5.4	1,640
2016	31.57	9,265	2.45	5.4	1,625
2017	31.81	9,306	2.42	5.4	1,609
2018	32.04	9,346	2.39	5.4	1,597

2.6 The level of eco-driving undertaken in the sectors is the next important feature of the baseline, as any policy intervention will aim to increase the uptake over and above this level. There is currently some level of eco-driving training undertaken in both sectors but there is uncertainty about both how much and what type is being undertaken. It is known that several large LGV operators have their own courses and actively manage fuel use. Many smaller operators may aim to reduce fuel use through driver training to an unknown extent.

2.7 In the LGV sector, there is an accreditation scheme for SAFED (www.safed.org.uk) which records some of the SAFED training undertaken, but not all. This shows that between 2003 and 2009 at least 15,000 LGV drivers have undertaken training. However, this does not account for training undertaken by unregistered trainers, or non-SAFED practical eco-driving training. Assuming these categories may account for the same number of drivers again, there may be around 30,000 drivers already trained.

Table 3: Baseline assumptions calculated from other sources – LGV			
Year	**Total UK driver population**	**Average fuel efficiency (miles per gallon)**	**Average annual driver fuel consumption (litres)**
Source	2009: ONS, others calculated	Calculated	Calculated
2008	309,527	9.10	
2009	310,454	9.21	29,638
2010	311,381	9.33	29,267
2011	313,902	9.38	29,103
2012	316,423	9.43	28,942
2013	318,945	9.49	28,783
2014	321,466	9.54	28,627
2015	323,987	9.59	28,473
2016	326,389	9.62	28,388
2017	328,792	9.65	28,303
2018	331,194	9.67	28,220
2019	333,596	9.70	28,138

Table 4: Baseline assumptions calculated from other sources – PCV				
Year	**Approximate number of buses and coaches in England**	**Average fuel consumption (litres)**	**Average annual kilometres driven**	**Average fuel efficiency (km per litre)**
2009	80,000	21,298	67,500	3.2
2010	80,000	21,124	67,500	3.2
2011	80,000	20,965	67,500	3.2
2012	80,000	20,746	67,500	3.3
2013	80,000	20,697	67,500	3.3
2014	80,000	20,694	67,500	3.3
2015	80,000	20,604	67,500	3.3
2016	80,000	20,506	67,500	3.3
2017	80,000	20,310	67,500	3.3
2018	80,000	20,109	67,500	3.4
2019	80,000	19,965	67,500	3.4

2.8 There has also been a recent assessment of the SAFED initiative, but the results are yet to be finalised. Awareness and use are highest for large operators and, while there are reasonably high levels of awareness for small and medium size operators, the level of use amongst smaller fleets is low. The draft results suggest that, between 2007 and 2009, up to 82,000 drivers have undertaken SAFED training.

2.9 As a central case we assume that around 30,000 drivers are already trained, with 82,000 as a maximum possible level (which lessens the impact of the policy to mandate).

2.10 An important feature of the baseline is the recent introduction of the Driver CPC syllabus for both LGV and PCV drivers, which mandates 35 hours of training over a five year period, and eco-driving is an eligible course for this certificate. A large range of types of courses are eligible for completing this certificate, with eco-driving just one option. This certificate has two important consequences:

- Drivers will be undertaking some form of training in the baseline in any case. Options 2 and 3 therefore do not result in taking drivers out of work for an extra day of training, but instead will replace other training with eco-driving.
- Early analysis of the operation of Driver CPC for PCV drivers gives us some evidence of how many drivers will undertake eco-driving training without further intervention.

We will also be consulting on whether the change to Driver CPC should extend to qualifying drivers.

2.11 The draft SAFED impact assessment suggests that the number of operators using SAFED has increased from 7 per cent in 2007 to 9 per cent in 2009. This suggests that there is a growing awareness within the LGV industry of the benefits of eco-driving training. However, the rate of uptake, notably amongst smaller fleets, is not at a sufficient pace to embed widespread uptake of eco-driving training across the industry.

2.12 This early analysis of the first year of Driver CPC for PCV drivers indicates that around 12 per cent of training undertaken for Driver CPC was classified by the DSA as eco-, or eco-safe, driver training. This 12 per cent figure was provided by the DSA and has a number of caveats:

- It is based on a review of the number of drivers who have completed courses that include words such as eco safe, defensive, SAFED, fuel efficient etc in the title.
- There are a number of courses that are simply titled Driver CPC or some similarly non-descriptive name. These may include an element of eco-safe driving but have not been included in the 12 per cent figure.

- The total may include some LGV drivers, as they started periodic training on 10 September 2009. It would be difficult from the information currently available to split the number exactly between LGV and PCV drivers.

2.13 Driver CPC for LGV drivers commenced in September 2009 and there is not sufficient data to consider the current take-up of eco-driving training amongst LGV drivers, but a similar level of take-up without Government intervention is anticipated, given the parallels between the PCV and LGV sectors and the broad range of other Driver CPC-eligible courses that are available. There is no evidence to suggest that the increase in eco-driving training amongst LGV drivers expected with the introduction of Driver CPC in September 2009 will be greater than that experienced in the PCV sector.

2.14 As drivers take five days' worth of training over five years, around 60 per cent of all drivers would end up taking eco-driving as one of the five days at the current level of uptake. However, this figure includes all types of eco-driving course, which will include some proportion of non-practical training. Therefore 60 per cent is taken as the maximum possible, with 30 per cent taken as a central case estimate of those who will take a practical course without intervention.

2.15 In the PCV sector we assume 10 per cent of drivers have currently received some form of eco-driver training. In the base case, we assume that this increases by around 15 to 20 percentage points per year up to 2013, when around 70 per cent of drivers are trained. This relatively fast uptake assumption reflects the fact that fuel costs are projected to increase over time and that the new bus subsidy system based on passengers rather than fuel means operators incur the full cost of their fuel. This greatly enhanced the case for investing in eco-driving training programmes. This assumption also reflects the fact that around two-thirds of the local bus market is dominated by five large operators who have a larger pool of resources to invest heavily and continuously in these initiatives in a relatively short period of time. With eco-driving training a mandatory element, it is assumed 100 per cent of drivers are trained by 2014 in the PCV sector Tables 5 and 6).

2.16 For appraisal purposes we have assumed an eight year appraisal period (from the time of introduction of the regulation) with new driver training undertaken from 2014. Under this baseline scenario, estimated total fuel benefits to bus and coach operators from 2011 to 2018 is around £89m in (2009 prices and values. Given lower fuel consumption results in reduced carbon dioxide emissions, there is also a wider social benefit that needs to be taken into account. The estimated carbon dioxide reduction emissions are around 385,000 tonnes from 2009 to 2018. This equates to a benefit of around £18m.)

2.17 As a sensitivity test we have also calculated the costs and benefits assuming no fuel savings are achieved the year after completion of training. In this case the benefits of this training are much reduced. The fuel-saving benefits to bus operators would be equal to £17m and the carbon benefits £4m.

Table 5: Baseline uptake of eco-driving training			
Year	Events	LGV drivers eco-driving trained in baseline – central scenario (%)	LGV drivers eco-driving trained in baseline – low impact scenario (%)
2009	Introduction of LGV driver CPC	10	26
2010		13	32
2011	Proposed implementation date	17	38
2012		21	45
2013		25	51
2014	End of first period of driver CPC (September)	29	58
2015		29	58
2016		29	58
2017		29	58
2018	End of impact of training from 2014	29	58

Table 6: Baseline uptake of eco-driving training for PCV	
Year	PCV drivers eco-driving trained in baseline – both scenarios (%)
2009	10
2010	25
2011	45
2012	65
2013	70
2014	70
2015	70
2016	70
2017	70
2018	70

3 Option 2: Increased promotion of the benefits

3.1 This option involves maintaining current regulations but increasing promotion of the benefits of eco-driving training, for example through increased marketing, improved best practice programmes of funding to

support investment. The potential level of increased marketing and promotion of eco-driving training is not known and may be shared through partnerships with trade associations.

3.2 This option avoids the need to regulate and could provide benefits above the no change position. However, a sustained communications campaign could be at a significant cost to Government with an unknown outcome.

3.3 We suspect this is the case because of the DfT's experience of marketing campaigns to the freight and logistics industry. Promotion of eco-driving training is already a key plank of FBP which is managed by the DfT. FBP is run at a cost of approximately £1.3m pa and the 2009 FBP Impact Assessment identified the following trends:

- 26 per cent of LGV operators are aware of FBP compared to 24 per cent in 2007; use of the programme as increased from 9 per cent in 2007 to 13 per cent in 2009. Guidance based on FBP is now also available through the Freight Transport Association, which is used by at least 15 per cent of operators.
- Use is highest among large operators; consequently the programme has reached a proportion of fleets which account 56 per cent of all vehicles in England.
- The main reasons given for not using FBP are: perceptions that it will not be a good use of time, it is not relevant to them or the manager already has sufficient knowledge.
- Generally the sector is positive about fuel efficiency and its close links to cost efficiency and business performance; however, there is a perception that there is not a great deal of potential to significantly reduce costs through implementing new or more measures.

3.4 These key points from the FBP Impact Assessment suggest that, generally speaking, there are sufficient concerns from within the industry about Government promoting fuel efficiency benefits, and the level of benefits attainable, that an increase in promotional activity, while beneficial, will not be adequate to ensure a comprehensive uptake of eco-driving training in the industry.

3.5 The details of the cost and benefits of any option taken up without regulation have not been worked up at this stage, as it is not clear in what way the impacts would be different to current activity. We have left this open for consultation.

3.6 The option would aim to get operators to send their drivers on eco-driving courses, as opposed to others types of eligible courses for the CPC. Therefore industry would incur the extra cost of practical training (around £47 per driver – discussed in Option 3) and the operators would not get the

benefit from the alternative training the drivers would have undertaken. These alternatives include the applications of regulations (eg working time regulations or use of tachographs), advanced training in rational driving (eg safe loading) and workplace accidents (eg personal safety).

3.7 The operators who chose to change would benefit from reduced fuel consumption (perhaps as much as £600 per year per trained LGV driver net of taxation) and this would benefit society in terms of reduced carbon emissions (up to 3.7 tonnes per year per trained LGV driver, worth £191).

4 Option 3: Eco-driving as a mandatory part of Driver CPC

4.1 Eco-driving training as a mandatory part of Driver CPC for LGV and PCV drivers (Option 3) is our preferred option. This would mean that most existing professional drivers would have to undertake an eco-driving training course as part of their Driver CPC obligations by the end of this period (9 September 2013 for PCV drivers, 9 September 2014 for LGV drivers), and in perpetuity for each subsequent period. At this stage it would not capture new drivers who undertake a theoretical component of eco-driving but would not be required to undertake eco-driving training as discussed in the consultation document. Option 3 is for a whole day of training and we reflect this in terms of both cost and benefit.

4.2 The main reasons for preferring this option are:

- While there are potentially some additional costs associated with practical driver training, our analysis suggests that this could be outweighed by the environmental and fuel savings for operators.
- It utilises a regulatory framework that is already in place and will not increase the regulatory burden on LGV and PCV operators.
- We are concerned that promotional activity will not increase the uptake of eco-driving training to a sufficient level to realise the majority of the attainable benefits.
- In addition, the European Union has declared competence for professional driving standards and it will be difficult to introduce alternative legislation outside Driver CPC.

4.3 An alternative policy option we considered was the introduction of eco-driving as part of the pass/fail element for LGV and PCV driver licences. However, this option would not address pre-existing drivers and have a limited impact on driver behaviour that would not sufficiently reduce emissions to meet the policy objective to make a major contribution to CO_2 reduction by 2022. For this reason, changes to driver licensing is not included as an option but is raised for discussion in the Consultation Document. Furthermore, DSA already have in place theoretical questions and case studies that cover eco-driving and are developing further test questions and case studies that clearly illustrate the impact that eco-driving can have on the environment and safety.

Costs – LGV sector

COSTS TO INDUSTRY

4.4 There are costs to industry of undertaking practical training, as opposed to other possible training courses, and costs to government in the form of increased DSA administration. We have therefore estimated the additional cost of training (reduced by the average costs of other Driver CPC courses) and DSA communication and compliance costs. We have not included the cost of a driver's non-working day, as this is a pre-existing cost required under Driver CPC.

4.5 Costs to industry: The effect of this option would be to cause drivers to undertake an eco-driving course to complete Driver CPC, rather than other alternatives. Initial checks by the DSA have found eco-driving courses ranging from £55 to £295, with an average price of £137 (based on five courses). This is based on a full day of training. The Joint Approvals Unit for Periodic Training (JAUPT) cannot approve a half-day course, as it is not compliant with UK regulations or the Directive. However, eco-driving may be one module of 3.5 hours within a seven-hour day of training.

4.6 The cheaper options may be classroom-based alternatives to practical training. The extent to which operators would have chosen cheaper options, and to what level, is an unknown. Nonetheless, it is a reasonable assumption that, but for making eco-driving a mandatory part of Driver CPC, some operators would choose a cheaper option. We have determined costs by taking the average cost of eco-driver training (£137) and deducted the average cost of a Driver CPC course (£90). However, these numbers are estimates only, given the significant variance of costs, which vary dependent on the training package provided.

4.7 The costs for PCV drivers attending a course would be much the same as for LGV drivers if they were attending an external course. However, a significant number of PCV drivers are employed by companies that deliver periodic training in-house. In these circumstances, there is probably no cost to the driver in the sense of having to pay to attend the training.

4.8 There may be additional costs incurred by operators if a vehicle is not in operation for the day of training. We have estimated these costs, although it is not a prerequisite of the regulatory proposal that drivers train in their own vehicles. However, if the training company offers vehicles, we would expect the price of the course to be higher to reflect this. An average LGV cost (weighted by the numbers of each different vehicle type) has been calculated using information from *Transport Engineer* from January 2009, a trade magazine that conducts an annual survey of truck operating costs. Per day operating costs are estimated to be around £86.

4.9 Therefore for a full day training course we estimate the additional cost to industry to be around £133 per driver trained. The total costs are shown in

Table 7 up until 2014. As we are appraising the impact for this Driver CPC period, there are no costs beyond 2014, even though the policy is expected to continue beyond this date.

4.10 As the mandating of eco-driving training will cause operators and drivers to undertake eco-driving courses instead of alternatives, industry will not gain the benefits of these alternative courses. These alternatives include the applications of regulations (eg working time regulations or use of tachographs), advanced training in rational driving (eg safe loading) and workplace accidents (eg personal safety). This is a non-monetised cost for this option, as we are not able to assess what these training courses provide.

4.11 These costs are correspondingly less in total when we assume a higher uptake in the absence of policy. This is reflected in the range of impacts given in the summary sheet. The DSA has not identified any other administrative costs for industry to comply, although drivers may have to travel further for the training, depending on how good the national coverage of course providers is. Trainers may have to tick an additional box on Driver CPC forms, but there are no significant additional administrative costs to consider.

Table 7: Costs to LGV industry of mandating eco-driver training – central case

	Percentage of drivers driving efficiently		Implied extra drivers trained in the year	Additional cost to industry of eco-driver training
	Baseline – without policy (%)	With policy (%)		
2010	13	13	0	**£0**
2011	17	30	39,872	**£5,288,105**
2012	21	50	51,526	**£6,833,737**
2013	25	70	52,342	**£6,941,961**
2014	29	90	53,158	**£7,050,185**
Total				**£26,113,988**

COSTS TO GOVERNMENT

4.12 If eco-driving were to be mandated as part of the Driver CPC, there will be costs associated with system development and DSA handling costs. These are currently non-monetised.

COSTS TO TRAINING PROVIDERS

4.13 Trainers may be adversely affected by the regulatory change; notably those trainers who have developed training packages without eco-driving components. These trainers may find it difficult to sell their product in the market, but the barriers to adaptation are not demonstrably high and trainers

not providing eco-driving training will absorb the remaining days of training required under Driver CPC.

Benefits – LGV sector

4.14 The benefits of this policy are operators saving fuel costs, which in turn save carbon emissions, and also some non-monetised safety benefits.

BENEFITS TO OPERATORS

4.15 Operators are expected to save fuel costs as a result of this policy. The benefit gained depends crucially on two factors:

- The level of fuel use reduction drivers achieve as a result of eco-driving training. At present we know that, on the day of training, drivers are shown to reduce fuel use by around 10 per cent, based on SAFED on-the-day fuel benefit reporting. As this is conducted with a trainer sitting beside them and just after the training, we would not expect this level of reduction in the real world. Five per cent is assumed in lieu of better evidence currently.
- Whether the impact of the training lessens over time and, if so, how fast it lessens. We have assumed the benefit lasts for five years but lessens by 10 per cent a year.

4.16 As these factors are so crucial, the DfT is conducting a study into them. The SAFED Longevity of Benefit study is under way and we will use the results of this as they become available to update our assessment of these proposals. All the estimates of the benefits depend on the two assumptions above. This is a 12 month research project that will provide a more accurate picture of the fuel savings attributed to eco-driving courses, and the results from this research will be input into any future impact assessment. There is a risk that the study will show that fuel savings are considerably eroded over time and that – furthermore – the active management of drivers is the determining factor in improved driver behaviour rather than eco-driving training in isolation.

4.17 To generate a likely range of impact we have assumed the impact erodes completely after one year to form the basis of a 'lower benefit' scenario. This is combined with the high baseline uptake (discussed in the baseline section) and the results included as the low end of the range on the summary sheet.

4.18 If the benefits do erode quickly, then this would be strong evidence for repeating the process during every five-year cycle.

4.19 Given the above assumptions, we are able to take the numbers of drivers trained per year and their average fuel consumption to calculate the amount of fuel saved per driver. This also takes into account an assumption that the

impact of the training decays over time (so that after five years drivers are saving 3 per cent of fuel instead of 5 per cent directly following training).

4.20 We have calculated the total value of the fuel that operators will no longer have to purchase. However, part of this saving is taxation. As such, this is a transfer and should not be included in assessing the benefits of the proposal. We have therefore removed the taxation element of the saving to show the resource cost of the fuel saved, ie what is the value of the actual fuel resources not used. This ensures that the benefit shown reflects what will accrue to society if the reduction in fuel use is as expected. The fuel–saving benefits to LGV fleet operators over an eight year period would be equal to £1,394m and the carbon benefits £150m (Table 8).

Table 8: Benefits to operators of policy – central case

Year	Total drivers driving more efficiently as a result of policy	Total fuel saved (million litres)	Diesel pump cost per litre	Total value of fuel saved to industry (£m)	Total resource cost of fuel saved – reflects net social benefit (£m)
2010	0	0	£1.16	£0	£0
2011	39,872	58	£1.19	£69	£24
2012	91,398	126	£1.21	£153	£53
2013	143,740	188	£1.23	£232	£80
2014	196,898	242	£1.24	£301	£104
2015	196,898	213	£1.25	£266	£92
2016	157,026	156	£1.25	£195	£68
2017	105,500	97	£1.26	£122	£43
2018	53,158	45	£1.26	£57	£20
Total		**1,126**		**£1,394**	**£485**

4.21 The 3 million tonnes of CO_2 savings and £300m attributed to driver fuel savings in the Carbon Reduction Strategy (CRS) are greater than the savings calculated in the IA. This is primarily due to the fact that the CRS calculation is based on the third carbon budgetary period (2018–22) and does not take into account the transition period as drivers adapt to the regulatory change over the first few carbon budgetary periods (2009–12; and 2013–17). It is also because we have revised upwards our estimate of the likely take-up of eco-driving without this regulation to reflect the latest information from the DSA on the uptake of courses.

BENEFITS TO SOCIETY

4.22 The major benefit to society is a reduction in carbon emissions as a result of lower fuel use. The carbon intensity of diesel fuel assumed is given above, and this can be applied to the estimates shown above to calculate the tonnes of carbon saved (Table 9). This is valued using the recently updated DECC values for the shadow price of carbon.[5]

4.23 Given that eco-driving training raises the general standard of driving, it is anticipated that there will be safety benefits for drivers, which will lead to improved safety for road users and reduced insurance costs.

4.24 There is also likely to be a fall in local air pollutants due to the reduction in fuel use and changes to braking patterns. This has not been quantified.

Table 9: Estimated carbon saved as a result of policy – central case

Year	Carbon intensity of diesel (kg CO_2 per litre)	CO_2 saved due to policy (tonnes)	Value of CO_2 per tonne	Total value of carbon saved (£m)
2010	2.54	0	£50.44	£0
2011	2.52	146,209	£51.20	£7
2012	2.51	317,491	£51.96	£16
2013	2.50	469,930	£52.74	£25
2014	2.49	603,741	£53.53	£32
2015	2.47	526,438	£54.34	£29
2016	2.45	382,806	£55.15	£21
2017	2.42	234,988	£55.98	£13
2018	2.39	107,559	£56.82	£6
Total		**2,789,162**		**£150**

Costs and benefits for the PCV sector

4.25 For the bus and coach sector, the estimated absolute benefits to bus operators of this option are fuel savings equal to around £131m from 2011 to 2018 (2009 prices and values), of which £72m is the resource cost of fuel saved (ie net of taxation). With improved fuel efficiency there is a reduction in carbon emissions worth £25m. The marginal impact relative to the baseline is a private benefit to bus operators in the form of improved fuel efficiency of £42m, of which £20m is the resource cost of fuel saved, and an additional carbon benefit of £7m.

5 See: IAG Greenhouse Gas Policy Evaluation and Appraisal in Government Departments (May 2009) for full guidance on these carbon values.

4.26 With more trained drivers under Option 3, there is also an estimated private sector cost of £3.4m (a further 25,000 drivers trained).

4.27 As with LGVs, a sensitivity test has also been carried out which assesses the costs and benefits assuming no fuel savings are achieved the year after completion of training (in the LGV analysis a higher baseline was assumed for this test, but this has not been assumed for PCVs because of the different nature of the sectors). In this case the benefits of Option 3 relative to Option 1 are much reduced. The fuel benefits to bus operators are equal to £5m (resource cost of fuel) and carbon benefits £2m (Table 10).

Table 10: Summary table of estimated PCV sector impacts of Option 3

	Central case	Low impact scenario
Benefits		
Fuel savings to operators (resource cost, net of taxation)	£20m	£5m
Carbon emission reduction	£7m	£2m
Costs		
Private sector cost of extra training	£3.4m	£0.5m

5. Broader context

5.1 The DfT's Carbon Reduction Strategy for Transport, *Low Carbon Transport: A Greener Future,* was published in July 2009 as part of the *UK Low Carbon Transition Plan*. It sets out how Government intends to reduce greenhouse gas emissions from transport. It also shows how transport will make a major contribution to UK efforts to reduce CO_2 emissions by 2022 and 2050 in line with the Climate Change Act 2008.

5.2 Emissions from freight movements stem primarily from the road sector, with LGVs representing around 20 per cent of total domestic transport greenhouse gas emissions. Whilst road transport will continue to play a vital role in the transport of goods, focusing our policies on reducing emissions from road freight is therefore important.

5.3 Within *Low Carbon Transport: A Greener Future*, the DfT showed that increasing the uptake of eco-driving courses has significant carbon saving potential. Our preliminary analysis showed that, if 90 per cent of LGV drivers were eco-driving trained, we could save up to 3 million tonnes of CO_2 over a five year carbon budgetary period (or 600,000 tonnes CO_2 of per year) and £300 million in fuel costs for the industry per year. We therefore committed to exploring how to achieve this 90 per cent uptake of eco-driving courses and then consult on the potential options for doing so, including whether making eco-driving a mandatory part of the Driver CPC will help us do this.

5.4 The DfT also sees this as an opportunity to improve the carbon performance of PCVs as well as LGVs and, should Driver CPC remain the preferred option, we would consider requiring both categories of driver to undertake eco-driving training as part of their Driver CPC obligations.

5.5 Driver CPC was introduced across the European Community to maintain high driving standards and improve road safety (European Directive 2003/59/EC). All professional bus, coach and lorry drivers must hold a Driver CPC if they want to drive for a living, a separate qualification from a driver's vocational driving licence. Driver CPC for PCV drivers was implemented on 10 September 2008, and for LGV drivers it was implemented on 10 September 2009. For PCV drivers, the first five year period ends September 2013 and for LGV drivers the first five year period ends September 2014.

5.6 In the UK, Driver CPC regulations are contained in the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007 (as amended).[6] The regulations require all drivers to complete a minimum of 35 hours of periodic training every five years. The training will require attendance at courses but will not require drivers to take or pass further examinations after their initial exam. The minimum length of a training course is seven hours.

5.7 New LGV drivers gaining a C1, C1+E, C or C+E licence from September 2009 (PCV drivers from September 2008) and wishing to drive in a professional capacity must take the Driver CPC. Any driver already holding a vocational licence at this date has 'acquired rights' to the Driver CPC and will not have to take the initial qualification. However, all current LGV and PCV licence holders will still have to undergo 35 hours of periodic training before the end of the five year period. This will be necessary to keep their Driver CPC valid.

5.8 Driver CPC is designed to improve road safety; help the environment by reducing emissions and fuel use; provide greater professionalism and better career development for drivers; and help the road transport industry to recruit and retain staff and enjoy a better public image. Courses on offer include the applications of regulations (eg working time regulations or use of tachographs), advanced training in rational driving (eg safe loading) and workplace accidents (eg personal safety).

5.9 European Directive 2003/59/EC prescribes the Driver CPC syllabus and member states have responsibility for approving accredited courses. In the UK, only courses that have been approved – and are being delivered by a training centre that has been approved – by the JAUPT will count towards the periodic training requirement. To date, the UK has not prescribed any training, or class of training, within the approved list of courses, and drivers (or their managers) may choose any combination of courses that fits their business needs.

6 SI No.2007/605.

5.10 The DSA has regulatory responsibility for Driver CPC in Great Britain, and the Driver and Vehicle Agency (DVA) has regulatory responsibility in Northern Ireland. Training providers inform the DSA or DVA whenever training takes place. Professional drivers are required to carry a separate Driver Qualification card at all times, which can be requested and checked by any EU enforcement agent. In the UK, this comprises the police and VOSA. For drivers with acquired rights, they only require this card from 2013/14, when their acquired rights expire.

5.11 The DSA estimates that approximately 12 per cent of all training undertaken in 2008–09 by PCV drivers could be categorised as eco-driving training. Driver CPC for LGV drivers commenced in September 2009, and there is not yet sufficient data to evaluate the current take-up of eco-driving training amongst LGV drivers. However, we anticipate that, given the relative similarities between the LGV and PCV market, without further action LGV drivers would undertake co-driving courses under Driver CPC at about the same rate as PCV drivers.

6. Risks

6.1 A key assumption is the benefit attributed to eco driver training. The SAFED programme has identified between 10–15 per cent fuel savings 'on the day' training, but this is likely to diminish with time. We have commissioned a SAFED Longevity of Benefit study to determine the extent to which the benefit of training is eroded over time. This is a 12 month research project that will provide a more accurate picture of the fuel savings attributed to eco-driving courses, and the results from this research will be input into any future impact assessment. There is a risk that the study will show that fuel savings are considerably eroded over time and that the active management of drivers is the determining factor in improved driver behaviour rather than eco-driver training in isolation.

6.2 There is also a risk that the cost of eco-driving training will increase significantly with the proposed regulatory change. To mitigate this risk, the consultation document considers measures to regulate costs without unduly impacting on market competition.

7. Competition

7.1 The affected markets are road haulage and passenger transport. The proposed option is not expected to directly or indirectly limit the range of suppliers in these markets, as it is thought that eco-driving has a relatively quick payback time for firms. The proposal does not limit the ability of suppliers in these markets to compete or reduce suppliers' incentive to compete vigorously in any significant way. Hence we judge that a detailed competition assessment is not required.

8. Impact on small firms

8.1 The proposed measure may have an additional impact on small firms in the short term, given the potential additional cost of eco-driving training. However, small firms will benefit from the fuel savings, and it is anticipated that in the longer term all operators will benefit financially from this regulation, with the payback period for most firms thought to be relatively short because of the likely fuel savings.

8.2 Our goal under the Climate Change Act is to reach 90 per cent of LGV drivers undertaking eco-driving training; therefore we do not envisage any potential to fully or partially exempt small businesses (those with fewer than 50 employees) from Option 3. The consultation is nonetheless open to the question as to how flexible any proposals may be in relation to small businesses, and we welcome suggestions for future IA analysis.

8.3 We are, therefore, interested in what impacts Option 3 will have on the operations and performance of smaller businesses that may be different to those it will have on other firms.

9. Legal aid

9.1 The proposed amendments should give no rise to additional legal aid claims.

10. Sustainable development

10.1 The proposed measures will have no impact on development, sustainable or otherwise.

11. Carbon assessment

11.1 The proposed measures will improve the carbon performance of professional drivers in the LGV and PCV sectors (see Justification note above).

12. Other environment

12.1 There should be no negative environmental impacts and the intervention will improve carbon performance and air quality.

13. Health impact assessment

13.1 By including safety as an eligible component of eco-driving training, and assuming that a general increase of eco-driving will also have a positive impact on safety, it is intended that this intervention will improve the safety performance of LGV and PCV drivers. The benefit of these safety improvements has not been given a monetary value.

14. Race equality

14.1 We intend the measures to be applicable to individuals irrespective of race, nationality, creed, or any other consideration.

15. Disability equality

15.1 See item 13 above.

16. Gender equality

16.1 See item 13 above.

17. Human Rights

17.1 The appropriate regulations will be drafted so as to avoid any infringement of human rights. Both EU Directive 2003/59/EC and the Vehicle Drivers (Certificates of Professional Competence) Regulations 2007 were drafted in compliance with principles of fundamental rights and human rights, and the Regulations will derive from powers in these instruments.

18. Rural proofing

18.1 The intervention will apply equally in urban and in rural areas.

Specific Impact Tests: Checklist

Type of testing undertaken	Results in Evidence Base?	Results annexed?
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

Questions

Q19: Do you agree with the draft Impact Assessment at Annex A – and/or can you help us to quantify more precisely the estimated costs and benefits?

Q20: Do you agree with the estimates provided for average distance driven and fuel used for LGV and PCV drivers? Please note that the estimates used are annual averages for drivers across all types of vehicles.

Q21: Do you agree that eco-driving training has not been widely taken up by small firms in the past – and/or can you help us to quantify the number of small firms that have undertaken eco-driving training?

Q22: Does your organisation operate any driver management systems? What costs/benefits have resulted in driver management systems?

Q23: What impact do you think Option 2 would have on the uptake of eco-driving training? Is it feasible that additional promotion would attract small operators and we would reach our 90 per cent target – if so, by when?

Q24: Are there alternative approaches for smaller firms, which would not materially affect the potential benefits from the policy?

Annex B: List of consultees

Aaron and Partners

AA (Motoring Services)

AA – The Driving School

ACPO

ACPO (Scotland)

ADI Federation

ADS Metal Services

AEA Technology

Agricultural Industries Confederation

Albion Inorganic Chemicals

Allied Bakeries

Ambulance Service Association

Amicus

Approved Driving Instructors National Joint Council

Argos Limited

Arriva plc

Asda Stores Limited

Associated Cold Storage and Transport Limited

Associated British Ports

Associated Cold Storage and Transport Limited

Association of British Insurers

Association of Chief Police Officers

Association of Chief Police Officers in Scotland

Association of Independent Businesses

Association of Independent Tour Operators

Association of Industrial Road Safety Officers

Association of International Couriers & Express Services Association

Association of Local Bus Company Managers

Association of Magisterial Officers

Association of Transport Co-ordinating Officers

Association of Vehicle and Recovery Operators

Association of UK Oil Independents

B&Q

Balfour Beatty

Ballast Phoenix

Bardon Aggregates

Barnados

BASF Plc

BG Group

Bibby Distribution

Biffa Waste Services Limited

Bifrangi UK Limited

Big Wheelers

Bison Concrete Products

BMW (UK) Manufacturing

Body Shop Plc
Bookers
Boots
Brake
Bridgnorth Aluminium Limited
Bristol Port
British Aggregates Association
British Association of Removers
British Cement Association
British Chambers of Commerce
British Driving Society
British Horse Association
British Gypsum Association
British Independent Motor Trade Association
British Industrial Truck Association
British International Freight Association
British Medical Association
British Ports Association
British Red Cross
British Retail Consortium
British Safety Council
British Shops and Stores Association
British Shipping
British Standards Institute
British Sugar plc
British Telecom
British Vehicle Rental & Leasing Association
British Waterways
Brunner Mond (UK) Limited
BSM Limited
BT Fleet Limited
Builders Merchants Federation
Bulmers
Bus Coach & Community Transport Working Group
Bus Users (UK)
Buxton Lime Industries
Bywaters
Cadbury Trebor Bassett
Campaign for Better Transport
Campaign to Protect Rural England
Can Grain Stores Limited
Canute Transport
Carbon Trust
Cargill
Carillon Fleet Management
Carlsberg UK Limited
Castle Cement Limited
CBI
Cemex Limited
Ceres Logistics
Ceva Logistics
Chemical Industries Association
Chief Fire Officers Association
Chivas & Glenlivet Group
CiLT (UK)
City Link Limited
Civil Service Motoring Association
Clancy Docra Limited
Cleveland Potash Limited
Coach Operators Federation
Commission for Integrated Transport
Commission for Racial Equality (England, Scotland and Wales)
Communication Workers Union
Community Transport Association
Compass Logistics International Limited

Confederation of Passenger Transport
Construction Equipment Alliance
Construction Industry Trade Alliance
Consumers Association
Consumer Focus
Convention of Scottish Local Authorities
CTC
Co-Operative Limited
Coors Brewers Limited
Corus Construction and Industrial
Cory Environmental
Croner CCH
Crown Prosecution Service
Dairy Industry Federation
Dairy UK
Dalgety Arable Limited
Danbrit Shipping Limited
Davie Malcolm Transport Limited
Day Group Limited
DB Schenker
Defence Logistics Organisation
Denby Transport
Department of Transport – Isle of Man
DFDS Torline Plc
DHL Limited
Digital Tachograph Solutions
Direct Rail Services Limited
Disability Action
Disabled Drivers' Association
Disabled Motorists Federation
Disabled Person Transport Advisory Committee
DOENI
Dow Chemical Company
DP World
DPD Geo
Drax Power
Drivetech
Drivers and vehicle Licensing Agency
Driving Instructors Association
Driving Instructors Democratic Union
Driving Instructors Scottish Council
Driving Standards Agency
Dunn Brothers Limited
Eddie Stobarts Limited
EDM
Edmund Nutall
Electrical Contractors Association
Employers Forum on Disability
Engineering Employers Federation
Enterprise plc
Environment Agency
Environmental Services Association
Eon
Energy Savings Trust
Esso
European Metal Recycling Limited
Eurotunnel
Farmers Union Wales
Federation for Small Businesses
Federation of Master Builders
Federation of Milk Groups
Federation of Petroleum Suppliers
Federation of Small Businesses
FedEx
Finance and Leasing Association
First Group plc
Fleet Van News

Food and Drink Federation
Food Storage and Distribution Federation
Ford Motor Company
Forestry Commission
Forestry Contracting Association
Forum of Private Business
Foster Tachographs Limited
Fosters Bakery
Freight by Water
Freight on Rail
Freight Transport Association
Freightliner Group Limited
GB Rail Freight
Gefco UK Limited
Geopost UK Limited
GEM Motoring Assistant
GMB Union
Go-Ahead Group plc
GoSkills
Government Offices
GrainFarmers
Great Bear Limited
Greater London Assembly
Grosvenor Waste Limited
Growhow UK Limited
Grundon Waste Management Limited
Government Car and Dispatch Agency
Grain and Feed Trade Association
Green Flag
Gregory Distribution
Group 4 Securicor
Guild of Experienced Motorists
Guild of British Coach Operators
Guild of Master Craftsmen
Telecommunications Industry
Hapag-Lloyd (UK) Limited Association
Hargreaves Services Group
Hard staffs
Harleyford Aggregates Limited
Health and Safety Executive
Highways Agency
Historic Commercial Vehicle Society
Homebase Limited
Home Delivery Network
Honda Logistics Centre (UK) Limited
Hoyer UK Limited
Humber Sea Terminal Limited
Hutchison Ports
IAM Foundation
IGD
Iggesund Paperboard
IKEA
INEOS Chlor Limited
InnovITS Limited
Intraining
URTU
Intermodal Logistics Limited
International Forest Products (UK)
Institute of Directors
Institute of Licensing
Institute of Mechanical Engineers
Institute of Road Safety Officers
Institute of Transport Administration
Institute for Transport Studies
Institute of Waste Management
Jaguar
JCB Sales Limited

JH Whitaker (Tankers) Limited
JJ Prior (Transport) Limited
JF Hillebrand
John G Russell (Transport) Limited
John Lewis Partnership
Johnston & Jeff Limited
JR Rix and Sons Limited
Jumbocruiser
Justices' Clerks' Society
Kellogg's
Kimberley-Clark
Knauff Limited
Kuehne and Nagle
Lafarge Cement
Learn and Live
Learning and Skills Council
Local Authority Road Safety Officers
Limbless Association
Local Government Association
London Borough Councils (14)
London Fire and Emergency
Planning Authority
London Gateway
London Government Association
London TravelWatch
Low Carbon Vehicle Partnership
M2 Training Limited
Maersk Line
Magistrates' Association
Malcolm Logistics
Maritime Transport Limited
Marks and Spencer plc
May Gurney Limited
McGrath Bros (Waste Control) Limited
Mediterranean Shipping Company
Medway Ports
Mendip Rail
Metrobus
Mercedes-Benz UK
Mersey Docks
MIDAS
Ministry of Defence
Mobilise
Morrison's
Motor Schools Association of GB
Motor Industry Research
Motor Insurers Bureau
Murco Petroleum Limited
National Association of Agricultural British Contractors
National Association of Licensing Enforcement Officers
National Association of Local Councils
National Association of Road Transport Museums
National Blood Service
National Courier Association
National Council for Voluntary Organisations
National Express Group
National Farmers Union
National Farmers Union Scotland
National Health Service
National Pharmacy Association
National Playbus Association
National Policy Improvement Agency
National Traction Engine Trust
National Trailer and Towing Association

National Union of Rail, Maritime and Transport Workers

Natural Gas Vehicles Association

National Assembly for Wales

National Association of Citizen's Advice Bureaux

National Grid

National Express Group plc

National Pensioners Convention

Nestle Business Services UK & IRE

Network Rail

NFT Distribution

NHS Fleet Managers Association

Nicholson Transport Limited

Nightfreight (GB) Limited

Nissan Motor Manufacturing

Norbert Dentressengle

Norfolkline

Novadata

NYK Group Europe Limited

Ocado Limited

Office of Law Reform

Office of Rail Regulation

P and O Ferries

Painters and Decorators Association

Palletline plc

Parcelforce Worldwide

Parliamentary Advisory Council on Transport Safety

Passenger Focus

Passenger Transport Executives in GB

PD Logistics

PD Ports

Peel Ports Group

Penmore Data

PepsiCo

Petroleum Industries Association

Petrochem Carless Limited

Police Federation of England and Wales

Port of Dover

Port of Tilbury London Limited

Portsmouth Port

Professional Drivers Association

Professional Van and Light Truck Magazine

Public and Commercial Services Union

Public Carriage Office

Public Transport Consortium

Quarry Products Association

RAC Foundation

Royal Association for Disability and Rehabilitation

RAC Motoring Services

RAC Foundation

Rail Freight Group

Railway Industry Association

Recruitment and Employment Confederation

Retail Motor Industry Association

Ringway Group

RMT

Road Haulage Association

Road Operators Safety Council

Road Peace

Road Rescue and Recovery Association

Road Roller Association

Road Safety Advisory Panel

Road Safety Council of Wales

Road Safety Wales

Royal Association of British Dairy Farmers

Royal Mail

Royal National Institute for Deaf People

Royal National Institute for the Blind

Royal Scottish Automobile Club (Motor Sport Limited)

Royal Society for the Prevention of Accidents

Royal Society for the Prevention of Accidents

(Scotland)

Royal Society for the Prevention of Accident

(Wales)

Roy Bowles Transport

RoadSafe

RoSPA

Ryder plc

Sainsbury's

Samworth Bros

Scottish Accident Prevention Council

Scottish Chamber of Commerce

Scottish Coal

Scottish Fishermen's Association

Scottish Government

Scottish Motor Trade Association

Scottish Police Federation

Seafish Industry Authority

Security Plus Limited

Senior Traffic Commissioner

SERA

Shanks Waste Management Limited

Shell UK

SITA UK

Skills for Logistics

Small Business Service

Society of Operations Engineers

Society of Local Authority Chief Executives

Society of Motor Manufacturers and Traders

Southampton Container Terminals Limited

St John Ambulance

Stagecoach plc

STVA

Sustainable Development Commission plc

Sustrans

Sweet and Maxwell

System Training Limited

T & G

Tachodisc Limited

Tarmac Limited

Tate & Lyle

Teamtrain Limited

Tesco Limited

Texaco

TDG Logistics plc

Thames Steel Limited

The Caravan Club

The Cartwright Group

The Original Tour

The Road Locomotive Society

The Scout Association

The Sea Cadets Corp

The Big Red Fleet Company

TMS Analysis

Transmark Heaton Valves Limited

Tilbury Container Services

TNT Express Limited
Trades Union Congress
Transfesa UK Limited
Transport and Health Study Group
Transport for London
Transport Tribunal
Transport 2000
Transport & General Workers Union
Travel WM
Travik Chemicals Limited
Truckersworld
TSSA
TUC
Tuffnells Parcel Express
TWL Training
Tynes Logistics Company
UK Coal
UK Major Ports Group
UK Road Safety
UK Warehousing Association
Union of Shop, Distributive and Allied Workers
Unipart Logistics
UNISON
Unite
United Biscuits
United Kingdom Agricultural Supply Trade Association
United Road Transport Union
University for Industry
UPM Irvine
UPS Limited
Veolia Environmental Services
Vehicle Lease and Service Limited
Vehicle Systems Installation Board
Viridor Waste Management
VolkerFitzpatrick
Volvo UK Limited
Waste Recycling Group plc
Wincanton Group plc
Wm Armstrong Limited
Yorkshire Water
Zim UK Limited

Annex C: Code of Practice on Consultation

The Government has adopted a Code of Practice on consultations. The Code sets out the approach Government will take to running a formal, written public consultation exercise. While most UK Departments and Agencies have adopted the Code, it does not have legal force, and cannot prevail over statutory or other mandatory external requirements (eg under European Community Law).

The Code contains seven criteria. They should be reproduced in all consultation documents. Deviation from the code will at times be unavoidable, but the Government aims to explain the reasons for deviations and what measures will be used to make the exercise as effective as possible in the circumstances.

The seven consultation criteria

1. **When to consult:** Formal consultation should take place at a stage when there is scope to influence the policy outcome.
2. **Duration of consultation exercises:** Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. **Clarity of scope and impact:** Consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. **Accessibility of consultation exercises:** Consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. **The burden of consultation:** Keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. **Responsiveness of consultation exercises:** Consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. **Capacity to consult:** Officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

A full version of the code of practice is available on the Better Regulation Executive web-site at: http://www.berr.gov.uk/files/file47158.pdf

If you consider that this consultation does not comply with the criteria or have comments about the **consultation process** please contact:

Giada Covallero
Consultation Co-ordinator
Department for Transport
Zone 2/25 Great Minster House
76 Marsham Street
London, SW1P 4DR

Email: consultation@dft.gsi.gov.uk

Annex D: Consultation Response Form

Part 1: Information about you

Name	
Address	
Postcode	
Email	
Company name or organisation (if applicable)	

Please tick one box from the list below that best describes you/your company or organisation.

☐	Small to Medium Enterprise (up to 50 employees)
☐	Large Company
☐	Representative Organisation
☐	Trade Union
☐	Interest Group
☐	Local Government
☐	Central Government
☐	Police
☐	Member of the public
☐	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?

If you would like your response or personal details to be treated confidentially, please explain why.

Part 2: Your comments

1. Do you agree with the proposed definition of eco-driving training – and, if not, why not? What changes do you propose? Is there anything else that should be included in the definition?

Please explain your reasons and add any additional comments you wish to make:

2. How important a role do you think management of driver behaviour has in maintaining eco-driving training benefits and reducing carbon emissions more generally?

Please explain your reasons and add any additional comments you wish to make:

3. What can Government and non-Government organisations do to promote the improved management of driver behaviour?

Please explain your reasons and add any additional comments you wish to make:

4. To what extent do you believe eco-driving training is currently being undertaken – and to what extent does this vary across small, medium and large firms? Please justify your answer, explaining why you believe this is the case.

Please explain your reasons and add any additional comments you wish to make:

5. To what extent do you believe that the rate of eco-driving training uptake will increase across small, medium and large firms in the future without additional action being taken by Government? Please justify your answer, explaining why you believe this is the case.
Please explain your reasons and add any additional comments you wish to make:

6. If Option 2 is pursued, what promotional strategies do you suggest Government should consider, with particular focus on strategies aiming to reach smaller firms?
Please explain your reasons and add any additional comments you wish to make:

7. If Option 2 is pursued, what role do you think voluntary industry action, alone or in partnership with Government, should play in promoting the benefits?
Please explain your reasons and add any additional comments you wish to make:

8. To what extent do you think elements of Option 2 would be required should Option 3 be the accepted approach?
Please explain your reasons and add any additional comments you wish to make:

9. Do you agree that eco-safe driving training should be included as an eligible substitute for eco-driving training – and, if not, why not?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

10. Do you agree with the inclusion and/or substance of the recommended structure proposed in relation to eco-driving training – and, if not, why not?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

11. If Option 3 is pursued, do you agree with the proposed elements that eco-driving training should consist of – and, if not, why not?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

12. If Option 3 is pursued, do you agree that eco-driving training should consist of seven hours and be undertaken in one training day – and, if not, why not?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

13. If Option 3 is pursued, do you agree that eco-driving training should only be mandated for periodic training, or should it be extended to the initial Driver CPC qualification?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

14. If Option 3 is pursued, do you agree that eco-driving training should be mandated to include PCV drivers – and, if not, why not?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

15. If Option 3 is pursued, would you consider an enforced price cap on the amount charged for eco-driving training, or periodic training generally, to be appropriate – and, if so, why?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

16. Which is your preferred option: Option 1, Option 2, Option 3, or none of these options?
Please explain your reasons and add any additional comments you wish to make:

17. If none of the options proposed in the consultation document is your preferred option, what alternative option(s) should we consider – and, if so, why?
Please explain your reasons and add any additional comments you wish to make:

18. Do any of these options have an impact on the competitiveness of UK industry – and, if so, why?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

19. Do you agree with the draft Impact Assessment at Annex A – and/or can you help us to quantify more precisely the estimated costs and benefits?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

20. Do you agree with the estimates provided for average distance driven and fuel used for LGV and PCV drivers? Please note that the estimates used are annual averages for drivers across all types of vehicles.	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

21. Do you agree that eco-driving training has not been widely taken up by small firms in the past – and/or can you help us to quantify the number of small firms that have undertaken eco-driving training?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

22. Does your organisation operate any driver management systems? What costs/benefits have resulted in driver management systems?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

23. What impact do you think Option 2 would have on the uptake of eco-driving training? Is it feasible that additional promotion would attract small operators and we would reach our 90 per cent target – if so, by when?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

24. Are there alternative approaches for smaller firms, which would not materially affect the potential benefits from the policy?
Please explain your reasons and add any additional comments you wish to make:

25. Do you consider this consultation has been conducted in accordance with the Code of Practice on Consultation (Annex C)?	YES ☐ NO ☐
Please explain your reasons and add any additional comments you wish to make:	

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