

Exempting commercial vehicles from Urban Vehicle Access Regulations (UVARs)

IRU POSITION

- The road transport industry recognises that cities face major challenges in terms of congestion and pollution, which require the urgent reorganisation of urban access, mobility and planning.
- Today, over 55% of people globally live in urban areas, rising to 70% by 2050. Cities are huge economic engines and commercial vehicles have long played a crucial role in managing their unique mobility and logistics challenges. As they continue to evolve, cities need commercial vehicles more than ever before.
- Cities are completely dependent on commercial vehicles to move people and goods into, out of, and around urban areas.
- Restricting commercial vehicles from cities has high economic and social costs: restricting goods and logistics impacts local business and residents by more than ten times the direct impact of road transport services; restricting passengers penalises the tourism industry, increases mobility poverty and limits efforts to reduce private car use to decarbonise mobility as a whole.
- Restricting commercial vehicles from cities also has limited benefits in reducing CO₂ emissions, pollution, noise or congestion: 90% of vehicles in urban areas are private passenger vehicles, therefore restrictions, where necessary, should distinguish between private and commercial vehicles to deliver the greatest cost-benefit solution.
- Commercial vehicles must be exempt from urban access vehicle restrictions due to the high costs, and negligible benefits, of restricting their access.
- Any regulatory changes that may impact commercial vehicle access must be discussed with mobility and logistics operators at least ten years before implementation, to account for current fleet renewal rates and technology investments. Schemes should be technology neutral, targeting specific outcomes rather than the technology used itself.
- Planning for proposed urban access restrictions must be transparent and inclusive. It should include an impact assessment, with a detailed cost-benefit analysis that will also be used to measure performance after implementation. It must also involve consultation with commercial road transport operators and other relevant stakeholders from the beginning of the planning process.
- Globally harmonised standards for urban access restrictions need to be developed, on a fully digital basis, to prevent a patchwork of multiple solutions in different cities adding legal uncertainty, operational challenges and more costs to mobility and logistics operators and the businesses and residents they serve.

- The commercial road transport industry is committed to supporting cities in their challenging endeavour to redesign urban mobility and logistics concepts in order to safeguard livelihoods and sustainable growth.

ANALYSIS

Cities around the world are increasingly introducing uncoordinated and fragmented UVAR schemes to address a range of policy objectives such as climate change, air quality, liveability and congestion.

More than 2,000 cities globally are considering or have implemented UVARs, impacting well over one billion people already today.

Very few of these schemes distinguish between private cars and commercial vehicles, even though their stated objectives should theoretically mean the scheme targets the 90% of vehicles in urban areas that are private passenger vehicles rather than the 10% that are buses, coaches, trucks and vans.

Despite minimal benefits to environmental or liveability objectives, the costs to cities of restricting commercial vehicles are high:

| Restriction type | Costs |
|-------------------------------------|--|
| Time based | Overall increase in costs to end consumers with lower service levels. Leads to inefficiency due to lack of flexibility on optimal routing. |
| Congestion pricing | Leads to increased costs of mobility and logistics services provided by road transport operators, which will be passed on to the final customer, ultimately impacting consumer and mobility behaviour, the local economy and city revenues. |
| Technology based | Banning or restricting certain types of technology, for example combustion engines, without available alternatives increases investment costs due to different technology requirements for different cities. This ultimately leads to reduced or cancelled services, impacting the social and economic life of citizens, and with a particularly acute impact in regions with operators servicing multiple cities. |
| Noise based | Could lead to de facto exclusion of certain technologies, which in turn will lead to operational inefficiencies, reduced services and increased costs. |
| General exclusion of heavy vehicles | Counterproductive effect with more and smaller vehicles needed on the road in order to continue delivering goods and services, leading to more congestion, and adversely impacting the broader local tourism sector. |

At the same time, the benefits of restricting commercial vehicles are limited, especially concerning three of the principle objectives in proposing access restrictions:

| Restriction objective | Benefits |
|---------------------------|---|
| CO ₂ emissions | Private passenger cars account for 75% of all CO ₂ emissions produced in road transport, but UVAR schemes tend to focus more on restricting commercial vehicles, which account for less than 3% of vehicles entering or operating in cities. |
| Pollutant emissions | Exhaust pollutants from commercial road transport are now a fraction of what they were two decades ago, having been reduced by up to 98%, leading to huge improvements in overall |

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|------------|--|
| | air quality in urban areas. Modern commercial vehicles remove over 99% of all particles formed in the combustion process, resulting in exhaust content that is comparable, and often even cleaner, than ambient air. Moreover, according to the OECD, a switch to battery electric vehicles will not bring any benefit or may actually lead to an increase in pollutant emissions. |
| Congestion | Commercial vehicles, with trained professional drivers, represent only 10% of all vehicles in an average city. Restricting their access has a correspondingly low impact on congestion, while the continuous increase in passenger cars should in fact be targeted. |

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