



**UK Government – Department for Transport: HGV phase out date  
consultation**

**Submission by ASLEF 23/08/21**

1. The Associated Society of Locomotive Engineers and Firemen (ASLEF) is the UK's largest train drivers' union representing over 21,000 members in train operating companies and freight companies as well as London Underground and light rail systems.
2. As a rail-specific union, we will be responding mainly to the section of the consultation regarding the introduction of ERS to help the UK Government reach its net zero target of 2050.
3. We welcome the initiative to stop the sale of GHG emitting HGVs by 2040 and understand the difficulties presented by trying to provide alternatives for haulage road users due to the current limitations of electric vehicle batteries and hydrogen fuel cells
4. The report discusses the possibility of rolling out ERS on major roads and motorways to compensate for the current limitations of batteries for long haul operators moving heavy loads. The report also concedes that it would take time to rollout sufficient infrastructure to cover the major regions of the UK, although the report does not touch on the potential costs of this large-scale investment.
5. Whilst we can see and understand how ERS could help to provide a solution to the aforementioned vehicle limitations, we are concerned that it is also overlooking the rail freight infrastructure that is already in place and capable of moving heavy loads across the country without the need for multiple vehicles on the road.
6. There is currently rail freight infrastructure in place on which one freight train can replace up to 80 HGVs from being on the road network. There is a potential to improve the already existing infrastructure to increase the volume of freight moved by rail, which would reduce the amount of investment needed in ERS.
7. The DfT has allowed rail freight to continue to sit in private hands and has chosen not to review this situation even after the pandemic had shown

how important rail freight. Particularly after the reduction in passenger services allowed for a safe increase in freight services, something which could be continued through proper investment into the infrastructure of rail freight along with the continued electrification of passenger rail.

8. We are concerned that through neglect and simply leaving rail freight to the concern of the private operators the DfT is missing a big opportunity to reach the net zero target date by investing in and improving rail freight infrastructure.
9. We believe that the DfT can make strides in reaching the government's targets by ensuring investment in rail freight leads to rail freight further becoming an attractive green alternative for haulers moving goods across the country. Looking at the transport network holistically water, rail and road could be combined to move goods reducing the over reliance on HGVs.
10. If rail freight is invested in and used to its full potential, we could also see less need for ERS across vast amounts of the UK as the heavy loads will be moved by rail. This would in turn, reduce the number of electric HGVs making long journeys on the road network and allow a quicker phase out of GHG emitting HGVs whilst the hydrogen fuel cell and electric battery technology develops further.

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