



Department  
for Transport

# Consultation on The Introduction of Green Number Plates for Ultra-low Emission Vehicles

**Moving Britain Ahead**

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# Ministerial Foreword

Last year the government published the Road to Zero strategy, which set out a comprehensive package of support to reach our ambition for all new cars and vans to be effectively zero emission by 2040.

We have since announced a 2050 net zero target for the UK. This puts the UK on track to end our contribution to climate change, becoming one of the first major economies to legislate for net zero emissions.

Consumer awareness and acceptance of zero emission vehicles remains a crucial part of this transition so that individuals and businesses can make confident decisions about what's right for them.

As technology develops at pace and as we prepare for mass adoption of electric vehicles, green number plates provide a simple way to cut through the complexity and raise awareness of this revolution that is taking place on our roads.

Being able to differentiate vehicles based on their environmental impact, will help inform road-users and normalise the idea of clean vehicles.

From individual drivers, to business fleets, to cities and local authorities, the scheme provides a huge opportunity for road users of all types to engage with and show leadership on transport emissions. Green number plates have the potential to be a powerful motivator to encourage road users to shift to cleaner vehicles

Getting the scheme right is crucial to its success. Therefore, I hope you will carefully consider what is being proposed and fully engage with the consultation process.



Rt Hon Grant Shapps MP  
SECRETARY OF STATE FOR TRANSPORT

# Executive summary

- 1 Our mission is to put the UK at the forefront of the design and manufacturing of zero emission vehicles, and for all new cars and vans to be effectively zero emission by 2040. The Road to Zero Strategy set out that by 2030 we want at least half of new cars sold, and as many as 70%, to be ultra low emission, alongside up to 40% of new vans.
- 2 As new models enter the market and as we prepare for mass adoption of electric vehicles, consumer awareness and acceptance of ultra low emission vehicles (ULEVs) remains a crucial part of this transition so that consumers and businesses can make confident decisions about what's right for them.
- 3 The commitment to consult on the use of green number plates for ULEVs was a flagship announcement by the Prime Minister at the UK's international Zero Emission Vehicle (ZEV) Summit on 11 September 2018. Green number plates provide a UK-wide mechanism which would enable people to spot and differentiate vehicles based on their environmental impact, help inform road-users and normalise the idea of clean vehicles on our roads. This plays an important part in encouraging road users to shift to cleaner vehicles.
- 4 Green number plates could also help local authorities to identify ULEVs and bring in local incentives for electric vehicles. Cities and local authorities have a crucial role to play during the transition to zero emission vehicles and addressing local air quality issues. Many cities and local authorities, including the eight [Go Ultra Low cities](#), are already taking action to accelerate the transition to zero emission road transport. Green number plates could help with local initiatives such as access to bus or low emission vehicle lanes, electric charging bays, free or reduced rate parking or ultra-low emission zones. They could also be used to support local communication and awareness campaigns.
- 5 The green number plate scheme must secure and maintain credibility, and the trust and confidence of stakeholders and the public. This means it must minimise risk to other policy areas. It must be futureproofed so that it does not get outdated by market change. The scheme must also be deliverable within existing structures and contexts, and in timescales that are appropriate to capture the growing ULEV market.
- 6 For these reasons, this consultation into how the green number plates should be delivered sets out government's initial view and reasoning on a range of aspects of the policy, inviting comment on these matters. Our aim with this approach is to focus the response of industry and the public, to ensure an outcome that is deliverable and minimises risk for other important policy areas.
- 7 **Our proposed position is that eligibility (page 15) should be restricted only to vehicles that have zero tailpipe emissions (e.g. full battery electric or hydrogen).** The Government believes that this would incentivise the very cleanest vehicles and would be simple to implement, enforce and for consumers to understand. The Government also believes that it would futureproof against rapid technology change, and would remain effective for decades to come as a strong

communications and behavioural tool to support the transition to zero emissions.

- 8 **Our proposed position is that the design (page 16) should be restricted to a green flash (Figure 2) or symbol (Figure 3) on the left hand side of the plate.** This is due to the risks to Automatic Number Plate Recognition Cameras (ANPR) from other designs (e.g. a full green background, like Figure 1). Designs on the left hand side of the plate are also more easily implemented and so are likely to be able to be brought in sooner, and so support the emerging vehicle market in its early years. Our initial moderate preference is for the design on the left hand side of the plate to be a green flash rather than a green symbol, as we believe it creates a more dominant identifier.



Fig.1 - green background, black text (design mock up for illustrative purposes)



Fig. 2 - green flash, black text (rear plate, design mock up for illustrative purposes)



Fig. 3 - green symbol, black text - (rear plate, design mock up for illustrative purposes)

- 9 **Our proposed position on rollout (page 19) of the plates is that they should be voluntary, but people could opt out.** We believe this would maximise the uptake and awareness raising effect of the plates, whilst at the same time maintaining goodwill and positive engagement with the scheme by allowing for scenarios where the plates would not be wanted or are less suited.
- 10 **Our proposed policy position on enforcement (page 20) is for a light touch scheme that fits into the existing number plate landscape in the UK, and that can be successfully delivered and operationalised in timeframes appropriate to**

**support policy goals.** For national enforcement, this means it would fall under this existing enforcement landscape around vehicles being supplied with and displaying eligible plates. Then formal local enforcement around accessing local incentives would likely be by the local authority reading vehicle plates through ANPR or some other means, and checking vehicle details. Government is exploring this aspect further. We do not envisage green number plates being the primary means of enforcement, but they could be an aid. Under this proposed approach there would be no material benefit to displaying a green number plate, unless you had a qualifying vehicle.

- 11 The consultation will close on Tuesday 14 January 2020, after which government will analyse responses. A government response will follow, that will set out next steps towards implementation. This will provide an overview of the legislative changes that will be needed to deliver the resulting scheme.

# How to respond

The consultation period began on Tuesday 22 October 2019 and will run until Tuesday 14 January 2020. Please ensure that your response reaches us before the closing date. If you would like further copies of this consultation document, it can be found at <https://www.gov.uk/dft#consultations> or you can contact [GreenNumberPlates@DfT.gov.uk](mailto:GreenNumberPlates@DfT.gov.uk) if you need alternative formats (Braille, audio CD, etc.).

Please send consultation responses to:

Address: Office for Low Emission Vehicles (OLEV), Great Minster House, 33 Horseferry Road, Westminster, London SW1P 4DR

Email address: [GreenNumberPlates@DfT.gov.uk](mailto:GreenNumberPlates@DfT.gov.uk)

When responding, 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.

## Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the Freedom of Information Act 2000 (FOIA) or the Environmental Information Regulations 2004.

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.

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, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act (DPA) and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

## Data Protection

The Department for Transport (DfT) is carrying out this consultation to decide on the introduction of green number plates for ultra low emission vehicles, including their eligibility, design, rollout and enforcement.

This consultation and the processing of personal data that it entails is necessary for the exercise of our functions as a government department. If your answers contain any information that allows you to be identified, DfT will, under data protection law, be the controller for this information.

As part of this consultation we're asking for your name and email address. This is in case we need to ask you follow-up questions about any of your responses. You do not have to give us this personal information. If you do provide it, we will use it only for the purpose of asking follow-up questions.

[DfT's privacy policy](#) has more information about your rights in relation to your personal data, how to complain and how to contact the Data Protection Officer.

Your information will be kept securely and destroyed within 12 months after the consultation has been completed. Any information provided through the online questionnaire will be moved to our internal systems within 2 months of the consultation end date.

# 1. Introduction

## Strategic context

- 1.1 Our mission is to put the UK at the forefront of the design and manufacturing of zero emission vehicles, and for all new cars and vans to be effectively zero emission by 2040. The [Road to Zero Strategy](#) set out that by 2030 we want at least half of new cars sold, and as many as 70%, to be ultra low emission, alongside up to 40% of new vans. The transition to zero emissions vehicles is central to meeting the Industrial Strategy and Clean Growth aims. The strategy set out a £1.5 billion package of support for the transition to zero emission vehicles.
- 1.2 We expect this transition to be industry and consumer led, supported in the coming years by the measures set out in the strategy. The strategy sets out a clear pathway to zero emissions, to give clarity and certainty to both industry and motorists. Progress is already being made, with sales of ultra-low emission vehicles at 2.6% of all new cars in 2018<sup>1</sup>, but we are still at the beginning of the journey.

## Green number plates

- 1.3 Consumer awareness and acceptance of ultra low emission vehicles remains a crucial part of the transition. [Go Ultra Low](#) (GUL) - the joint government-industry marketing campaign for ultra low emission vehicles - plays an important role in providing information to consumers and businesses so they can make confident decisions about what is right for them.
- 1.4 As technology develops at pace and as we prepare for mass adoption of electric vehicles, green number plates provide a further opportunity to raise awareness of this revolution that is taking place on our roads, encouraging further take up as people realise that more and more vehicles are green and clean - to help achieve the 2040 target.
- 1.5 The commitment to consult on the use of green number plates for ULEVs was a flagship announcement by the Prime Minister Theresa May at the UK's international Zero Emission Vehicle (ZEV) Summit on 11 September 2018.

## Highlighting the presence of ULEVs

- 1.6 The main aim of green number plates is to highlight the presence of ULEVs – it is a very visible way of distinguishing such vehicles and raising their profile. We're currently likely to underestimate the prevalence of ULEVs on our roads partly because it's often hard to tell them apart from conventionally powered vehicles.

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<sup>1</sup> SMMT data on registrations of Electric and Alternatively Fuelled Vehicles, available here: <https://www.smmt.co.uk/category/news/registrations/evs-afvs/>

- 1.7 Green number plates would provide a UK-wide mechanism which would enable people to spot and differentiate vehicles based on their environmental impact, help inform road-users and normalise the idea of clean vehicles on our roads. This plays an important role in encouraging road users to shift to cleaner vehicles.
- 1.8 Green number plates would also provide an opportunity for commercial road users in competitive mobility industries such as taxi fleets, couriers and car clubs to differentiate themselves and convey their green credentials and leadership to consumers. Similarly, green number plates would support wider progressive corporate social responsibility messaging for companies with vehicle fleets. This has the potential to be a powerful motivator for many private consumers.

## Supporting emission based local policies

- 1.9 A secondary benefit of green number plates is that they could help local authorities to identify ULEVs and bring in local incentives for electric vehicles such as access to bus or low emission vehicle lanes, electric charging bays, free or reduced parking or ultra-low emission zones.
- 1.10 Cities and local authorities have a crucial role to play during the transition to zero emission vehicles and addressing local air quality issues. Many cities and local authorities are already taking action to accelerate the transition to zero emission road transport, including the eight [Go Ultra Low cities](#).
- 1.11 Green plates would also provide a clear identifier that cities and local authorities could use to support local engagement, and awareness raising campaigns and initiatives. In conjunction with local signage they would provide a simple yet effective tool to reinforce access rules to infrastructure like electric vehicle charging bays.
- 1.12 Several local authorities have already indicated the plates would enable clearer visual recognition of vehicles eligible for local incentives, such as access to bus lanes (like in Nottingham), ultra low or zero emission zones and cheaper parking. This becomes a useful visual tool for local enforcement officials, as well as road users of all vehicle types. This visual identifier could then serve the wider purpose of conveying local policy and political priorities in tackling carbon and air quality challenges.

## Ensuring green number plates stand out but fit in

- 1.13 UK cities and local authorities are increasingly bringing in city wide or more localised policies to encourage cleaner vehicles in their areas. Targeting localised pollution hot spots or helping the wider transition towards longer term air quality and climate change goals, these policies often include incentives and restrictions for vehicle types, based on their emissions.
- 1.14 This landscape of local action based on vehicle emissions is complex, and includes action mandated through central government, as well as local leadership and innovation. These initiatives include: Clean Air Zones being introduced in certain areas in 2020 and subsequent years, in order to deliver compliance with legal NO<sub>2</sub> limits set out in the government's 2017 [NO<sub>2</sub> plan](#); [Nottingham's bus/ULEV lane](#); policies like Oxford's proposed [zero emission zone](#); and emissions restrictions for taxi and private hire vehicle licencing, for example in Dundee.

- 1.15 Consumers have historically low engagement with vehicle emission performance, and there is low awareness of metrics such as gCO<sub>2</sub>/km and zero emission range. For these reasons, government committed in the Road to Zero strategy to set out definitions of ultra low and zero emission vehicles that local areas may adopt, to give clarity and consistency to consumers and businesses. We plan to publish this in coming months.
- 1.16 As more and more cities and local authorities are taking action to accelerate the transition to zero emission road transport, green number plates provide a simple, standardised identifier that is of value to local areas in engaging their road users. Such local measures and incentives must be locally led, to ensure they meet local needs and are integrated within wider transport and mobility plans.
- 1.17 Formal enforcement of bus lanes and ultra low emission zones in the UK is largely done by Automatic Number Plate Recognition (ANPR) cameras, where number plates are read and vehicle and vehicle keeper information is checked. Further consideration is required around how this should work for local authorities bringing in policies that utilise green number plates. As is the case now, number plate characters rather than the colour will be read. It is noted that wider technology based enforcement tools will also continue to emerge in the future - such as smart, connected vehicles, that alert the driver to parking conditions.

## Number plate landscape in the UK

- 1.18 Vehicle Registration Numbers ('number plates') are a way of identifying vehicles, and are allocated to vehicles as part of the process of registering vehicles in the England, Wales, Scotland and Northern Ireland. Vehicle Registration Numbers must be correctly displayed on number plates as set out in the [Road Vehicles \(Display of Registration Marks\) Regulations 2001](#) (the "Display Regulations"), that govern how vehicle registration number plates are designed, manufactured and displayed.
- 1.19 All UK number plate suppliers must, by law, be registered with the DVLA as a Registered Number Plate Supplier (RNPS), who will need to see proof of name and address, and verify that the vehicle has the right to display the particular registration number (e.g. by showing the V5C logbook<sup>2</sup>) before supplying a number plate. In the UK, there are currently over 40,000 RNPS. They receive number plates, or plate components from one or more component manufacturers, who in turn source raw material for the reflective, adhesive, acrylic and other components.
- 1.20 The design and display requirements for number plates are specified through legislation, principally the Display Regulations that stipulate the font, size, colour and spacing of number plate characters, the background colour of front and rear plates, and reflectivity. A British Standard (BS AU 145d) also stipulates background colour (white for front; yellow for rear), as well as a host of technical requirements including retroreflection, colourimetry, and resilience against weathering, bending, solvents and impact.
- 1.21 [EC Council Regulation 2411/98](#) allowed member state vehicles to display the European symbol and GB national identifier on the number plate, to avoid the need for a separate GB sticker when travelling within the EU. Government's advice is that following the UK's exit from the EU, drivers should display a GB sticker on the rear of the vehicle, whether or not they have a number plate which includes the GB

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<sup>2</sup> The V5C registration certificate (log book) contains information about the vehicle, names the registered keeper and registers the vehicle with the DVLA

identifier. The Display Regulations were [amended in 2009](#) to allow the optional display of the UK's national flags and identifying letters that are specified in legislation on the left hand side of the plate.

- 1.22 Section 59 of the [Vehicle Excise and Registration Act 1994](#) makes it an offence to display registration plates other than in accordance with the statutory requirements. Section 45 of the Road Safety Act 2006 amending the Vehicles (Crime) Act 2001, makes it an offence to supply a plate bearing a vehicle registration mark that does not comply with regulations concerning the manner in which registration numbers must be displayed.
- 1.23 The above restrictions on number plate design, supply and display are crucial given the increasing use of technology to read vehicle registration plates – such as automatic number plate recognition (ANPR) and road enforcement cameras. In this context a joint industry-government working group, chaired by DVLA, and commissioned by the Surveillance Camera Commissioner, is looking at the number plate regime.

## International examples of green number plates

- 1.24 Variants of green number plates have been introduced by several national and regional governments including in Norway, Hungary, Canada and China. These have been used for both awareness raising and as an identifier for incentives (e.g. access to bus lanes and parking incentives).
- 1.25 The Canadian province of Ontario has brought in a scheme that allows vehicles displaying green plates to access Ontario's High Occupancy Vehicle (HOV) and High Occupancy Toll (HOT) lanes, even if there is just one person in the vehicle. Alongside other supportive policy measures, Ontario Ministry of Transportation advises that the plates have been a positive factor in consumer purchasing decisions.

## Considerations and consultation approach

- 1.26 Targeted stakeholder engagement prior to this consultation has helped develop understanding about potential ways the scheme could be successfully implemented. This has also helped identify themes and questions that will be explored through the consultation. These include:
  - Eligibility - What emissions standards should vehicles meet to qualify for the plates?
  - Design - What should the plates look like?
  - Rollout - How would the plates be accessed, and should they be mandatory? Which type of vehicles should be eligible for them?
  - Enforcement - What should be the approach to enforcement, at a national and local level?
- 1.27 The green number plate scheme must secure and maintain credibility, and the trust and confidence of stakeholders and the public. This means it must minimise risk to other policy areas, and be futureproofed so that it does not get outdated by market change. The scheme must also be deliverable within existing structures and

contexts, and in timescales that are appropriate to capture the ever growing vehicle market.

- 1.28 For these reasons the consultation will set out government's initial view and reasoning on a range of aspects of the policy, then invite comment on these matters. This will focus the response of industry and the public and ensure an outcome that is deliverable and minimises risk for other important policy areas (e.g. to ANPR camera functionality).

## 2. Consultation themes and questions

### Eligibility

- 2.1 Establishing appropriate emissions-based eligibility criteria for green number plates is crucial to ensuring the policy creates the correct signals and incentives. It is also vital to secure credibility for the policy, and be clear for road users and the wider public to understand, both now and into the future.
- 2.2 This is challenging, as the ULEV market is one of innovation and change, with new models coming on the market every year, bringing increased performance and zero emissions range. It should also be noted that introducing green number plates would likely require legislation to be amended, which would require parliamentary time and depending on the extent of the changes needed could take two to three years.
- 2.3 Recognising advancements in technology, the Road to Zero Strategy set out that from 2021 we expect to define an ULEV as a car or van that emits less than 50 grams of CO<sub>2</sub> per kilometre from the tailpipe. Our starting point is that the requirement for green number plates should be no less stringent than that definition.
- 2.4 To help respondents navigate these issues, below we set out three potential options and set out some of their pros and cons, before giving our initial policy position and inviting comment. We will also allow respondents to describe and give reasoning for their own option if that is not included here.

#### Option 1: Zero tailpipe emissions only

- 2.5 This option would restrict green number plates to zero tailpipe emissions only (e.g. full battery electric or hydrogen). It would rule out anything with a combustion engine, avoiding a position whereby a green number-plated vehicle could be releasing emissions from the tailpipe. This option incentivises the very cleanest vehicles and would be simple to implement, enforce and for consumers to understand. It would futureproof against rapid technology change, remaining effective for decades to come as a strong communications and behavioural tool to support the transition to zero tailpipe emissions. However, there would initially be fewer qualifying vehicles on the roads, lessening the awareness raising impact. This approach may have the effect of making plug-in hybrids and other hybrids appear not green, when in practice they can bring significant environmental benefits.

#### Option 2a: CO<sub>2</sub> emissions of less than 50g/km and a WLTP zero emission range of at least 70 miles

- 2.6 An alternative approach would be to base eligibility on the criteria for the Plug-in Car Grant (PiCG), so CO<sub>2</sub> emissions of less than 50g/km and a WLTP<sup>3</sup> zero emission range of at least 70 miles. This mainly captures full electric (battery and hydrogen) vehicles, though some plug-in hybrid and range extender electric vehicles could

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<sup>3</sup> Worldwide Harmonised Light Vehicle Test Procedure (WLTP) laboratory test is used to measure fuel consumption and CO<sub>2</sub> emissions from passenger cars, as well as their pollutant emissions.

qualify. This approach would capture more vehicles in the short term, but be harder to articulate and less easily understood by road users and the wider population. It is also arguably harder to operationalise, as it would require registered number plate suppliers (RNPS) have access to additional data around zero emission range and make accurate determinations about whether to issue green plates or not. Further, the fact that vehicles with a green number plate would sometimes be operating in combustion engine mode risks creating confusion around the green credentials of the policy. As with option 1, option 2a may have the effect of making non-eligible vehicles appear not green, when they can bring environmental benefits.

#### Option 2b: CO<sub>2</sub> emissions of less than 50g/km

- 2.7 Similar to option 2a in that it matches the Road to Zero 2021 ULEV definition, but removes the zero emission range requirement. In order to achieve this level of gCO<sub>2</sub>/km, it is likely that the vehicle would have to have at least a moderate zero emission range. Although we cannot rule out the possibility of further technology advances, this requirement would exclude today's non plug-in hybrids, but capture the vast majority of plug-in hybrid electric vehicles. This would likely be easily administered, as CO<sub>2</sub> emissions is a metric that appears in vehicle registration systems and documentation for cars first registered from 2001. There may be questions as to how ambitious and stretching this option would be- in the longer term. Though plug-in vehicles can bring significant environmental benefits, and are an important way of helping motorists make the switch to a different way of powering their vehicles, the extent to which they are driven in zero emission mode depends much on their range and driver behaviour.

#### Proposed policy position

- 2.8 Our proposed position is that eligibility should be set at Option 1, so restricted to zero emission vehicles only (e.g. full battery or hydrogen fuel cell electric). This is due to being simple and transparent, and very easy for consumers to understand. It incentivises the cleanest vehicles, and would be futureproofed against rapid technology change, staying effective as a strong communications and behavioural tool to support the 2040 policy objectives.

#### Consultation questions

**Q1a: Do you agree with our proposal that only zero emission vehicles would be eligible for green number plates?**

**Q1b: If you disagree, explain why, including what requirement you think would be suitable?**

## Design

- 2.9 The design of green number plates is crucial to providing an effective awareness-raising and communications tool, also establishing and maintaining buy-in and trust by avoiding wider policy risks. It must be a design that can be delivered through legislative change in an appropriate timeframe.
- 2.10 Since the commitment to consult was made, the phrase “green number plates” has been used. The final design could be green, or retain green elements. Prior engagement of expert stakeholders has been very useful in mapping out some of the challenges, risks and limitations of certain design approaches.
- 2.11 These considerations are reflected in government's proposed policy position that we set out and are inviting comment on below.

### Option 1: Green background

- 2.12 The first option is to have green background and black or white text (fig 1). This would provide strong visual identification and differentiation, so would provide a strong awareness raising signal - to serve the core purpose of this policy. Other countries have a full green plate, so there would be international alignment.
- 2.13 The current use of black text on white (front) and yellow (rear) background in the UK is used because of its high contrast, and so supports witness visual testimony and vehicle identification through Automatic Number Plate Recognition (ANPR) cameras. This contrast is created in ANPR cameras by infrared light being able to bounce off the retroreflective background but not the text characters, leading to the character void being read by the camera.
- 2.14 A change from white/yellow to green background is very likely to diminish this contrast. The same would be true for black lettering on a green background, or green lettering on white/yellow background.
- 2.15 Testing of potential designs would be needed, but it is highly likely any change away from black text on white/yellow background will result in reduced ANPR performance. If a shade of green background was suitable for ANPR, it is likely to be a paler shade of green that is less easily visible to the human eye and does not serve awareness raising goals. A change to green background would also mean we lose the front (white) and rear (yellow) vehicle visual aid, which can be useful for visual testimony.
- 2.16 To change the background of the plate would, in addition to the Display Regulations, require a change to the British Standard BS AU 145d. Whilst possible, this is a lengthy process.



Fig.1 - green background, black text (design mock up for illustrative purposes)

### Option 2: Green designs on the left hand side of the plate

- 2.17 A separate approach to number plate design would be to make use of the space on the left hand side of the plate, either for a green flash (fig 2) or symbol (fig 3). This area of the physical plate is not read by ANPR, so whilst the design is specified in legislation it does not come with the same level of technical restrictions.
- 2.18 A change to this area of the plate would require an amendment to the Display Regulations, but not the British Standard, so is easier to implement. This amendment would stipulate the design, and eligibility criteria for a vehicle to display the plates.
- 2.19 This area can currently be used to display the UK's national flags and identifying letters, so consideration is needed as to if and how the two design elements could coexist. Government is advising those with a GB national identifier that they will need to display a GB sticker on the rear of the vehicle when travelling in the EU after the UK's exit from the EU, so the identifier may become less common.

2.20 There is scope to pursue a green flash, or a simple green symbol with this approach. Views on this are sought through the consultation questions.



Fig. 2 - green flash, black text (rear plate, design mock up for illustrative purposes)



Fig. 3 - green symbol, black text - (rear plate, design mock up for illustrative purposes)

### Proposed policy position

2.21 Our proposed position is for Option 2, green designs on the left hand side of the plate. This is due to the risks to ANPR of Option 1, and because Option 2 is more easily implemented and so is likely to be able to be brought in sooner, capturing the emerging market. Government's initial moderate preference is for the design on the left hand side of the plate to be a green flash rather than a green symbol, as it creates a more dominant identifier.

### Consultation questions

**Q2a: Do you agree with our proposal that the green number plate design should be restricted to the left hand side of the number plate?**

**Q2b: If you disagree, explain why, including what you think would be more suitable?**

**Q3a: For the design on the left hand side of the number plate, do you think this should be:**

- a green flash?
- a green symbol?
- something else?

**Q3b: If applicable, please specify other ideas for the design using the left hand side of the plate**

**Q4a: Should the left hand design be displayed in addition to national flags and lettering that can occupy that area of the plate?**

## **Q5a: What other views and reasoning on the design of the green number plates do you feel should be considered?**

### **Rollout**

- 2.22 Chapter 1 describes the way in which number plates are issued in the UK by registered number plate suppliers (RNPS) and vehicle dealers, both to new vehicles at first registration and to existing vehicles that have been previously registered. It is proposed here that the RNPS or dealerships will have to establish if the vehicle is eligible for a green number plate (e.g. through make/model information or the V5C logbook), and issue the correct plates as required. Stakeholder engagement to date has suggested that the UK number plate industry is very well equipped to supply green number plates once introduced, and at negligible cost change if any.
- 2.23 We envisage not all drivers will want to display green number plates - as some may not want to highlight their use of qualifying vehicles, or may not want to use them for other reasons. We believe the plates need to be made available to new and existing eligible vehicles.

#### **Option 1a: Non-mandatory but opt out**

- 2.24 Having the plates as voluntary but opt-out creates a landscape where the plates are encouraged and seen as the default option, but allows for people to not have them if they wish. This reduces the awareness raising effect, as there will be qualifying vehicles on the roads without the green plates.
- 2.25 As part of designing the implementation of an opt-out scheme, careful consideration would have to be given to finding a suitable process to help consumers opt-out if they wanted to.

#### **Option 1b: Non-mandatory but opt in**

- 2.26 Having the plates as voluntary but opt-in allows for people to not have them if they wish, but means they are not as encouraged and seen as the default option. This is likely to reduce uptake, and as such the awareness raising effect.

#### **Option 2: Mandatory**

- 2.27 Making the plates mandatory would result in more vehicles displaying the plates, and likely simplify the issuance of the plates as there would be only one option for eligible vehicles. Though making the plates mandatory is likely to be seen negatively by some.

### **Vehicle type**

- 2.28 It is proposed here that green number plates would be available to qualifying cars, vans, taxis and motorbikes, but that buses, coaches and HGVs would be out of scope. Whilst we are not ruling out that green number plates could be applied to heavy vehicles in the future, they present a different proposition, each with different purchasing and public perception incentives, so are out of scope for now.

### **Proposed policy position**

- 2.29 Our proposed policy position is for Option 1a: non-mandatory but opt out. This is to maximise the uptake and awareness raising effect of the plates, but to maintain good-will and positive engagement with the scheme by not imposing the plates on drivers and allowing for scenarios where the plates are not wanted or are less suited.

## Consultation questions

**Q6a: Do you agree with our proposal that the green number plates should not be mandatory?**

**Q6b: If you disagree, explain why, including what you think would be more suitable?**

**Q6b: Do you agree with our proposal that the green number plates should be opt-out?**

**Q6c: If you disagree, explain why, including what you think would be more suitable?**

**Q7a: Do you agree that after the introduction of the plates both new and existing qualifying vehicles should be able to access them?**

**Q7b: If you disagree, explain why, including what you think would be more suitable?**

**Q8a: Do you agree that green number plates should be open to qualifying cars, vans, taxis and motorbikes, but that buses, coaches and HGVs are out of scope?**

**Q8b: If you disagree, explain why, including what you think would be more suitable?**

## Enforcement

- 2.30 The proposed delivery model for the green number plates scheme is one that fits into the existing number plate landscape in the UK, has no negative impact on ANPR performance, and that can be successfully delivered and operationalised in timeframes appropriate to support policy goals. This lighter touch implementation approach is reflected in: the proposed policy position on design; the way green number plates will be used by local authorities; and the way they are enforced - both nationally and locally.
- 2.31 A light touch scheme has the potential to be implemented in around 12-18 months, and would be able to be in place to support vehicle uptake in the early 2020s - a key period in the transition to mass market uptake. A scheme that requires a greater legislative intervention, could take 3-4 years, given the breadth of legislative and potentially regulatory change.

### National enforcement

- 2.32 At present it is an offence to supply or display a plate that a vehicle is not eligible for. If green number plate design and eligibility is brought in through an amendment to the [Display Regulations](#), then the plates would fall under this existing police enforcement landscape around vehicles displaying eligible plates.

### Local enforcement

- 2.33 The secondary benefit of green number plates is that they could help local authorities to identify ULEVs, for local supporting policies, communication campaigns and potentially incentives. Crucially however, the design of the plates would only be a soft enforcement aid, that provides a visual tool to help indicate vehicle type and eligibility. This has applications for local officials like parking attendants, but also other road users and the wider public, where the plates would be a good first indicator of emissions and eligibility.

- 2.34 It is proposed here that local authorities would continue to use systems such as ANPR for formal enforcement of any local incentives, as is the case now for the policies including the London Ultra Low Emission Zone (ULEZ), Nottingham bus/ULEV lane, and wider bus lane enforcement across the UK.
- 2.35 Under this proposed approach there would be no material benefit to displaying a green number plate, unless you had a qualifying vehicle. Soft enforcement by local officials and other informed road users would quickly identify non-eligible vehicles using green number plates. Those vehicles attempting to access a local incentive in a non-eligible vehicle with green number plates would be conspicuous. However, as formal enforcement would, under our proposals, be through systems such as ANPR, our assessment is that green number plates are unlikely to increase the risk of number plate fraud and cloning.
- 2.36 The introduction of local measures or incentives must be locally led. So local authorities that seek to utilise green number plates will need to consider the design and operation of their policies to ensure an appropriate penalty regime is in place and has an appropriate basis in law. In a scenario where green plates are opt-out (non-mandatory), government's suggestion to local authorities would be that eligible vehicles would be able to access local incentives if they displayed the green plate or not.

#### Proposed policy position

- 2.37 Our proposed policy position is for a light touch scheme that fits into the existing number plate landscape in the UK, and that can be successfully delivered and operationalised in timeframes appropriate to support policy goals. For national enforcement, this means it would fall under this existing enforcement landscape around supplying and displaying eligible plates. Then formal local enforcement around accessing local incentives would likely to be via the local authority reading vehicle plates through ANPR and checking vehicle details. Government is exploring this aspect further. Under this proposed approach there would be no material benefit to displaying a green number plate, unless you had a qualifying vehicle. Displaying the plates should not be mandatory for eligible vehicles accessing any local incentives they decide to bring in.

#### Consultation questions

**Q9a: Do you agree with our proposal to seek a light touch scheme that can be implemented more quickly so as to capture the emerging vehicle market?**

**Q9b: If you disagree, explain why, including what you think would be more suitable?**

**Q10a: Do you agree with our proposal that the scheme should fit into the existing regulatory and enforcement landscape around the supply and display of eligible plates?**

**Q10b: If you disagree, explain why, including what you think would be more suitable?**

**Q12a: Do you agree that the visual characteristics of green number plates should only serve as a soft enforcement mechanism?**

**Q12b: If you disagree, explain why, including what you think would be more suitable?**

# What will happen next

A summary of responses, including the next steps, will be published within three months of the consultation closing on <https://www.gov.uk/search/policy-papers-and-consultations> Paper copies will be available on request.

If you have questions about this consultation please contact:

Address: Office for Low Emission Vehicles (OLEV), Great Minster House, 33 Horseferry Road, Westminster, London SW1P 4DR

Email address: [GreenNumberPlates@DfT.gov.uk](mailto:GreenNumberPlates@DfT.gov.uk)

# Annex A: Full list of consultation questions

## Eligibility

Q1a: Do you agree with our proposal that only zero emission vehicles would be eligible for green number plates?

Q1b: If you disagree, explain why, including what requirement you think would be suitable?

## Design

Q2a: Do you agree with our proposal that the green number plate design should be restricted to the left hand side of the number plate?

Q2b: If you disagree, explain why, including what you think would be more suitable?

Q3a: For the design on the left hand side of the number plate, do you think this should be:

- a green flash?
- a green symbol?
- something else?

Q3b: Specify other ideas for the design using the left hand side of the plate

Q4a: Should the left hand design be displayed in addition to national flags and lettering that can occupy that area of the plate?

Q5a: What other views and reasoning on the design of the green number plates do you feel should be considered

## Rollout and approach

Q6a: Do you agree with our proposal that the green number plates should not be mandatory?

Q6b: If you disagree, explain why, including what you think would be more suitable?

Q6b: Do you agree with our proposal that the green number plates should be opt-out?

Q6c: If you disagree, explain why, including what you think would be more suitable?

Q7a: Do you agree that after the introduction of the plates both new and existing qualifying vehicles will be able to access them?

Q7b: If you disagree, explain why, including what you think would be more suitable?

Q8a: Do you agree that green number plates should be open to qualifying cars, vans, taxis and motorbikes, but that buses, coaches and HGVs are out of scope?

Q8b: If you disagree, explain why, including what you think would be more suitable?

## Enforcement

Q9a: Do you agree with our proposal to seek a light touch scheme that can be implemented more quickly so as to capture the emerging vehicle market?

Q9b: If you disagree, explain why, including what you think would be more suitable?

Q10a: Do you agree with our proposal that the scheme should fit into the existing regulatory and enforcement landscape around the supply and display of eligible plates?

Q10b: If you disagree, explain why, including what you think would be more suitable?

Q11a: Do you agree that the visual characteristics of green number plates should only serve as a soft enforcement mechanism?

Q11b: If you disagree, explain why, including what you think would be more suitable?

Q12: Please provide any other views around the expected cost of implementing this policy

Q13: Any other comments?

## Annex B: Consultation principles

The consultation is being conducted in line with the Government's key consultation principles which are listed below. Further information is available at <https://www.gov.uk/government/publications/consultation-principles-guidance>

If you have any comments about the consultation process please contact:

Consultation Co-ordinator  
Department for Transport  
Zone 1/29 Great Minster House  
London SW1P 4DR  
Email [consultation@dft.gsi.gov.uk](mailto:consultation@dft.gsi.gov.uk)