



## **Cycling at Tea-time**

# **DfT Consultation on Electrically Assisted Pedal Cycles**

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# The Bicycle Association



- **Independent trade body**
- **Represents the UK cycle industry**
- **Not: a campaign group**
- **Provides: technical and regulatory advice.**



# Regulation of micro-mobility/LZEVs



**Industry is NOT opposed to innovation & change**

**Benefits for:**

- **Non-users of cycles**
- **Congestion reduction**
- **Decarbonisation & pollution reduction.**

**BUT there are established procedures for:**

- **Testing, approving, certifying, regulating**
- **Construction and use**
- **International standards**

## Draft Transport Bill 2022

- New LZEV framework
- New categories within this for each vehicle type
- Avoids future confusion about vehicle legality.

## EAPC consultation 2024

### *Current regulations:*

- 250W, throttle assist to 4 mph, motor cuts out if not pedalling, and at 15.5 mph.

### *Proposed regulations:*

- 500W, throttle power without pedalling to 15.5 mph.

# Questions to consider



## Why?

- Who are the proponents?
- Why the urgency?
- Why make 'piecemeal' change?
- Why do it this way?

## What?

- What evidence is there of the need? Of safety? Of utility?
- What are the benefits?
- What alternatives already exist?
- What are the risks?
- What unintended consequences may arise?

# The principles



## **DEFINITION**

What is a pedal cycle and what is not?

## **FRAMEWORK**

What is exempt from type approval?

## **STANDARDS**

Construction, use, testing, certification?

## **PRODUCTS**

Which products exist now?

## **ENFORCEMENT**

Is it enforceable?

## **LEGALITY**

Is it legal?

# The risks



## **ACCELERATION**

Extra weight => greater accident impact

- cycle lanes
- shared spaces
- (disabled) pedestrians

## **FIRE RISK**

No pedalling => more charging, higher currents, bigger batteries

No reputable products available

=> more use of conversion kits, tampering

=> more fire risk

# The unintended consequences



## **BACKLASH**

will lead to demands for mandatory helmets & insurance (cf mopeds)

## **SLIPPERY SLOPE**

once these requirements apply to EAPCs, pedal cycles would be next

## **LEGALISES TAMPERING**

as it would be legal to convert existing EAPCs to the new spec

## **HIGHER SPEEDS**

Surely the next 'popular' change?

## **HEALTH DISBENEFIT**

Not active travel



# In summary



## These consultation proposals are:

- **Unnecessary**
- **Risky**
- **And entirely the wrong approach to the future regulation of micromobility**

## The industry would welcome:

- **A clear LZEV framework**
- **Evidence-based regulations for each new vehicle type**
- **Retain the well proven EAPC regulations**

# In summary



**A cycle industry product safety expert's reaction is telling:**

“Although this proposal has demonstrably been under consideration for several months, it smacks of a fantastical solution to an imaginary problem, that has not been logically thought through.

How are responsible businesses supposed to demonstrate product safety compliance when there is neither a safety standard nor Type Approval process that can be applied to such products?

And do we really believe that allowing 500W twist-and-go multi-track cycles to use cycle lanes will be conducive to increasing cycling and active travel? Can't see it myself.”

# Last word



“When I use a word”, Humpty Dumpty said, in a rather scornful tone, “it means just what I choose it to mean - neither more nor less”.

“The question is”, says Alice, “whether you can make words mean so many different things.”

“The question is”, said Humpty Dumpty, “which is to be the master - that’s all”

— Lewis Carroll, *Through the Looking Glass*