



## APPG for Cycling and Walking

# DfT Consultation on Electrically Assisted Pedal Cycles

**Phillip Darnton OBE**  
**Chair, Bicycle Association**



# 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.”