

European Commission
Secretariat-General
Consultation "Reducing CO2 emissions from cars"
BERL 6/262
B-1049 Brussels

LTI is Britain's largest remaining automotive manufacturer. We are universally recognised for building the iconic 'London style taxi', purpose-built for disability access.

In our response to the 'implementation of the renewed strategy to reduce CO2 emissions from passenger cars and light-commercial vehicles', legislative framework consultation, we consider, an absolute limit of 120g CO2 / km (including 10% 'complimentary measures'), as unrealistic for the future of our business. We would request that the Commission considers the 'utility function' of our vehicle in assessing its CO2 emission limit or some form of *de minimis* provision in the final legislation for niche market manufacturers. This would provide sufficient protection for the future of LTI and disability accessible taxis in the UK.

LTI use one engine, currently a 2.5 litre VM Motori R. As we do not manufacture our own engine we are reliant on other manufacturers developing a powertrain, which can be built into our taxi; this inevitably causes a delay (which we would estimate at around 2-3 years after the introduction of the original engine manufacturer's engine) in acquiring and developing a powertrain system to fit our vehicle. LTI also require a 5 year amortisation period for return on investment. Our latest engine designed to meet Euro 4 standards, and launched in October 2006, will require until 2012 to amortise the original £5.5million investment.

The latest model, the TX4, weighs just over 2,500kg. The vehicle's weight is partly a result of national policy and regional regulations requiring our vehicle to have full disability accessibility, which adds weight to the vehicle. However, these accessibility features are important for the transportation of thousands of disabled passengers each day across the U.K., providing vital door-to-door transport for disabled users in all areas, from remote regions to cities. In many areas there is no other form of transport for disabled people. In London, our vehicle is used to provide a door-to-door service via the London Taxicard Scheme, funded by the Mayor of London, Ken Livingstone, and Association of London Government Transport and Environment Committee. The scheme transports 4000 people each day with "serious mobility impairment and difficulty in using public transport" across the Greater London region, many of which require a wheelchair accessible vehicle. We also manufacture our taxi to provide an exceptionally high level of protection for passengers and drivers against impacts; this is achieved through the rigidity of the chassis, which again adds weight to the vehicle.

While the regulatory burden has added weight to the taxi, its utility as a vehicle designed to transport a number of passengers allows it to carry up to 5 passengers and on average 2.5 passengers per journey¹; this should be considered as lower personal emissions i.e. on average CO2 emissions in a TX4 is 89g CO2 per km, rather than for an individual driver in a saloon car with an average new vehicle output of 163g CO2 / km. LTI are currently working on a number of projects to develop a lower emissions vehicle, but manufacturing a commercially viable vehicle with lower emissions is extremely challenging for an automotive manufacturer of our size.

As the London taxi is designed to carry 5 passengers, transport disabled passengers, and to operate as part of the integrated transport system, the 'utility function' of the vehicle is far greater than a saloon car; so while we share the same M1 category as a saloon car, our utility function is very different.

As a niche manufacturer, building circa 2,500 vehicles per year we would be unable to continue production of our full disability accessible vehicle if we were required to reduce CO2 emissions to 120g CO2 / km by 2012. Further, we believe that, if implemented without provision, this communication will have a serious long term impact on the transportation of disabled passengers in the U.K. and would therefore not be socially equitable. We request that the Commission considers the utility of our vehicle or some form of *de minimis* provision for the London taxis to meet emissions limits of 233g CO2 / km.

Should you require any further information on the above submission, please do not hesitate to contact me on +44 (0) 20 7700 9881 or email rdaniels@lti.co.uk.

Yours faithfully

Richard Daniels
Government Affairs Manager

¹ Public Carriage Office (Transport for London) Report 2004, prepared by Affy Scott