

Regulatory Committee

9.30am, Monday, 23 August 2021

Age Limitation and Emissions Standards for Taxis and Private Hire Cars – Retrofit

Executive/routine	
Wards	All
Council Commitments	

1. Recommendations

- 1.1 It is recommended that the Regulatory Committee:
 - 1.1.1 Notes the contents of this report;
 - 1.1.2 Agrees to amend the policy in respect of retrofit as set out in paragraph 4.11 and to delegate authority to the Executive Director of Place to approve LPG retrofit conversions in the future;
 - 1.1.3 Agrees to extend the Age and Emissions Policy milestones as outlined at paragraph 4.22; and
 - 1.1.4 Discharges the action from the Committee in May 2021 on retrofit options available for taxis and Private Hire Cars.

Paul Lawrence

Executive Director of Place

Contact: Andrew Mitchell, Regulatory Services Manager
E-mail: andrew.mitchell@edinburgh.gov.uk | Tel: 0131 529 4042

Contact: Gordon Hunter, Regulatory Officer (Licensing)
E-mail: gordon.hunter@edinburgh.gov.uk | Tel: 0131 529 4042

Age Limitation and Emissions Standards for Taxis and Private Hire Cars – Retrofit

2. Executive Summary

- 2.1 On [17 May 2021](#) the Committee considered an update on the Taxi and Private Hire Cars Age Limitation and Emission Standards Policy which was introduced on 16 March 2018. The Committee requested a further report providing additional information on retrofit options available to the trade which may have an impact on age limit and Euro 6 in the City of Edinburgh Council standards and licensing regime.
- 2.2 This report provides the Committee with an update on the implementation of the policy and discharges the remit to provide an update on retrofit devices for taxis and private hire cars (PHCs).

3. Background

- 3.1 The licensing of taxis and PHCs is an optional activity in terms of the Civic Government (Scotland) Act 1982 ('the Act'). As Licensing Authority under the Act, the City of Edinburgh Council passed a resolution in terms of Section 9 of the Act stating that Sections 10 to 23 of the Act shall have effect throughout the city, and that licences shall be required for taxis and PHCs from 1 July 1984 ('City of Edinburgh Taxi and Private Hire Car Driving Resolution 1983').
- 3.2 Section 10 of the Act requires the licensing authority to be satisfied as to the suitability in type, size and design of a vehicle for use as a taxi or PHC before granting or renewing a taxi or PHC licence.
- 3.3 On 16 March 2018 the Regulatory Committee agreed an age and emissions policy for taxis and PHCs (Appendix 1), which took effect from 7 May 2018, which:
 - 3.3.1 Introduced an age limitation in respect of taxis and PHCs; and
 - 3.3.2 Will incrementally increase the minimum emissions standards for the engines in these vehicles, which will improve emissions standards.

- 3.4 On [2 November 2020](#), the Committee agreed to amend the terms of the Age and Emissions policy taking account of the pandemic, by delaying the implementation date of the following milestones until 30 September 2021 for:
- 3.4.1 Existing vehicles - no application will be accepted for licensing a taxi or PHC or as a replacement vehicle for an existing taxi or PHC if it was more than 10 years old (from the date of first registration); and
- 3.4.2 Vehicles not currently licensed - no vehicle will be accepted for licensing as a taxi or PHC or as a replacement vehicle for an existing taxi or PHC unless it is a Euro 6.
- 3.5 Since the introduction of the age and emissions policy the Licensing Service has received approximately 600 applications to vary the conditions of taxi or PHC licences. These have been referred to Committee to determine whether an exemption to the policy should be made.
- 3.6 The following table provides a year-by-year breakdown of decisions made by the Committee on applications for exemption since the implementation of the policy in May 2018. Time periods relate to the policy anniversary date. Members will note the % increase in the total number of applications which were granted in the 2019 - 2020 and 2020 - 2021 period compared with the 2018 - 2019 period (the first year of the policy):

	2018-2019	%	2019-2020	%	2020-2021	%	Total	%
Granted	137	48%	141	73%	91	76%	369	62%
Withdrawn	32	11%	16	8%	11	9%	59	10%
Refused	115	40%	29	15%	16	13%	160	27%
Continued	2	1%	8	4%	2	2%	12	2%
Total	286	100%	194	100%	120	100%	600	100%

- 3.7 On 17 May 2021 the Committee requested a further report providing additional information on retrofit options available to the trade which may have an impact on age limit and Euro 6 in the City of Edinburgh Council standards and licensing regime, so that it could consider any modifications of the policy which would assist with the policy's ongoing implementation.

4. Main report

Retrofit/replacement engines and aftermarket devices

- 4.1 Retrofit means altering a vehicle's engine to reduce its emissions. Most retrofit systems fit to the existing 'dirty' engine and clean it up. Adding a filter and catalyst to the engine's exhaust reduces particulate matter (PM) and oxides of nitrogen (NOx), made up of nitrogen monoxide, or nitric oxide (NO) and nitrogen dioxide (NO₂). Particulate matter (PM) includes soot and wind-blown dust. A diesel

particulate filter (DPF) is fitted to remove 98-99% of tailpipe particulates. Nitrogen oxide (NO_x) comprises nitric oxide (NO) and nitrogen dioxide (NO₂). By fitting a selective catalytic reduction (SCR), NO_x is reduced by 80-90%.

- 4.2 In some cases, a vehicle can be re-engined, i.e. the old engine is replaced with a new, cleaner engine. However, this requires significant upgrades to other parts of the vehicle's fuel and exhaust systems to be effective (i.e. replacement engine or LPG conversion).
- 4.3 When the Committee last considered this issue on [20 May 2019](#) it decided not to include provisions for retrofit/replacement engines or aftermarket devices within the Age and Emissions Policy.
- 4.4 The relevant advice offered to the Committee at that time can be summarised as follows:
 - 4.4.1 Upgrading a vehicle's engine does not automatically mean that there is an improvement to the emissions level;
 - 4.4.2 Any upgrade or installation of an aftermarket device requires ongoing regular maintenance to be effective. Where not maintained appropriately, this will not have the desired or purported beneficial impact on the vehicle's emissions; and
 - 4.4.3 Installation of aftermarket devices or retrofits do not automatically change the Euro Emissions Rating of a vehicle. An application can be made to DVSA to amend the tax bracket (therefore indicating that a reduced emissions rating has been applied to the vehicle). Where evidence of such an application being approved by the DVSA is provided, such a case should be considered on its own merits.
- 4.5 Whilst changes to policy and adoption of new technology may seem desirable on the part of the trade, in practice this has to be measured against the ability to put in place the correct checks and balances to ensure that technological solutions meet necessary standards and deliver the Council's wider policy intentions. Experience has shown that what is proposed may look reasonable in theory, but assessing suitability is difficult to achieve in practice. Certification is often difficult to obtain for individual vehicle owners, and the Taxi Examination Centre (TEC) is often presented with vehicles for exemption without evidence to support the case for exemption.
- 4.6 At the Regulatory Committee meeting on 17 May 2021, following a deputation by the trade and correspondence from City Cabs, the Committee asked Council officers to consider the use of retrofit systems generally, in particular with respect to a system approved by the Energy Savings Trust (Appendix 3). The Committee requested an update at the next available meeting.
- 4.7 The [Energy Savings Trust](#) is an independent, not-for-profit UK-based organisation focused on promoting action that leads to the reduction of carbon dioxide emissions. It is funded by both the UK and Scottish governments and the private sector.

- 4.8 The Energy Savings Trust and Transport Scotland have advised that not all retrofit solutions are considered suitable or appropriate and have established a 'Clean Vehicle Retrofit Approval Scheme' ('CVRAS accreditation'). Under this scheme the Energy Savings Trust has now approved a specific retrofit solution for Mercedes Vito, Mercedes M8 and Peugeot E7 wheelchair accessible taxis. This approved retrofit solution is supplied by Cybrand AEC LTD, and certification of this system is detailed in Appendix 3.
- 4.9 Council officers have noted that this system appears to be a fairly robust upgrade to vehicles that, once installed, only requires minimum maintenance by way of adding 'AdBlue', mirroring modern technology used in most new Euro 6 diesel engines. AdBlue is a solution which breaks down NOx into harmless nitrogen and oxygen.
- 4.10 In addition to the system approved by the Energy Savings Trust, there are a number of aftermarket devices and fuel additives that manufacturers claim can improve fuel economy and/or reduce exhaust emissions. The majority of aftermarket devices require ongoing maintenance and do not provide a permanent or fixed solution to emissions.
- 4.11 Glasgow City Council is now approving retrofit solutions on a case-by-case basis, where the system has been approved by the Energy Savings Trust, relevant certification has been received and confirmation provided that it does not interfere with the structural integrity of the vehicle.
- 4.12 Given that there are a wide range of retrofit solutions available, it is recommended that City of Edinburgh Council's policy is changed to allow retrofit, subject to the following conditions:
- 4.12.1 Any such systems must be approved by the Energy Savings Trust;
 - 4.12.2 relevant certification must be provided prior to submitting the vehicle for test at the TEC;
 - 4.12.3 the system is installed by a garage approved by the Energy Saving Trust Accreditation Scheme; and
 - 4.12.4 the retrofit solution does not interfere with the structural integrity of the vehicle.

LPG vehicles

- 4.13 The ability to retrofit existing licensed vehicles to using LPG fuel has previously been agreed by the Committee. Whilst LPG is a cleaner form of fuel than diesel or petrol, it is still a fossil fuel. The Committee has previously agreed to allow licensed vehicles to be converted to LPG as a short-term alternative to more polluting fuels, but any such decision to convert a vehicle was a commercial decision at the risk of the operator and not something advocated by the Council. The licensed fleet currently includes approximately 30 vehicles that have been converted to LPG.

- 4.14 The decision to approve the addition of a vehicle to the fleet after conversion to LPG is currently made by the Licensing Sub-Committee on a case-by-case basis. It is not proposed to change the policy in relation to LPG vehicles, but it is proposed that the Scheme of Delegation should be amended to delegate authority to the Executive Director of Place to approve such retrofit conversions in the future.
- 4.15 For members' information there are currently no LPG refuelling sites in Edinburgh, and the nearest service stations are in East and West Lothian. The provision of LPG is a commercial business activity and the previous five sites in Edinburgh have all closed. The trade has been exploring options, but to date no alternative supplier has been identified.

Low Emission Zone (LEZ)

- 4.16 Low Emission Zones (LEZs) in Scotland are mandated by the Scottish Government to reduce longstanding exceedances of legal air quality objectives (Nitrogen Dioxide (NO₂)) originating from urban road traffic. LEZs help to improve air quality by discouraging the most polluting vehicles from entering an area, which will help to improve public health and wellbeing. In May 2021, the regulations to give local authorities detailed powers under the Transport (Scotland) Act 2019 to create and enforce LEZs became law.
- 4.17 The Scottish Government and four of the Scottish cities (Aberdeen, Dundee, Edinburgh and Glasgow) have agreed an indicative timeline to implement LEZs by Spring 2022, taking account of the impact of the COVID-19 pandemic. LEZs will be operational once agreed grace periods have expired. A grace period of two years is proposed for Edinburgh's LEZ scheme, which means that, subject to approval, enforcement of the LEZ will commence in Spring 2024.
- 4.18 The Council's preferred scheme is currently undergoing a period of public consultation before final approval is sought and formal notice is provided to all consultees prior to implementation in 2022. During the consultation period it is intended that engagement with key stakeholder groups including members of the taxi and PHC trade will take place.

Age and Emission Update

- 4.19 There are currently 1,308 licensed taxis in Edinburgh and 2,331 PHCs.
- 4.20 Approximately 1,327 vehicles have already been upgraded to meet the new conditions. It is anticipated that approximately 270 vehicles will be required to be upgraded over the next 12 months, as a result of the policy changes due to take effect.
- 4.21 The next policy milestones will take effect from 1 September 2021 having been delayed from 1 April 2021:
- 4.21.1 For existing vehicles, no application will be accepted for licensing a taxi or PHC or as a replacement vehicle for an existing taxi or PHC if it is more than 10 years old (from the date of first registration); and

4.21.2 For vehicles not currently licensed, no vehicle will be accepted for licensing as a taxi or PHC or as a replacement vehicle for an existing taxi or PHC unless it is a Euro 6.

4.22 The last milestone that is due to take effect is on 1 April 2022, when:

4.22.1 No taxi or PHC will thereafter be accepted for test unless it is Euro 6 or above. Separately to this requirement, any Euro 5 Taxi or PHC that has passed its test and is licensed prior to 1 April 2022 may continue to be operated until its licence expires, or **31 March 2023** - whichever date is earliest.

4.23 Recognising the challenges faced by both the taxi and PHC as a result of the pandemic, it is proposed that the milestones detailed at paragraph 4.20 should be extended to take effect from 1 April 2022. In addition, it is proposed that the milestone detailed at paragraph 4.21 that is due to take effect on 1 April 2022 should also be extended to 1 April 2023.

4.24 These changes to policy would:

4.24.1 Allow licence holders to purchase Euro 5 vehicles, which are not already part of the City of Edinburgh licensed fleet, for an extended period up until 1 April 2022;

4.24.2 Potentially assist members of the trade who want to convert vehicles and engines to LPG; and

4.24.3 Enable licence holders to retain vehicles for an additional six month period prior to having to replace their existing vehicles.

4.25 Any extension to the Age and Emission timeline must take into account the LEZ implementation timelines, particularly the intention that enforcement of the LEZ will, subject to approval, commence in Spring 2024. The very latest date that any extension to the Regulatory Committee Age and Emissions Policy taking effect would therefore be 1 April 2023. This means that the hire car fleet will be required to be Euro 6 compliant by Spring 2024, or they will be unable to operate within the LEZ designated areas within the city.

Exemption from Policy

4.26 The Committee is asked to note that the position remains unchanged in that any applicant for either the grant or renewal of a taxi or PHC licence may request that a standard condition should be disapplied in relation to his/her licence. Where an applicant seeks an exemption from the standard conditions in relation to either the age limitation or emission standards, such applications will be referred to the Committee for determination on a case-by-case basis, and it will be for individual applicants to set out their position as to why the conditions should not be applied. In any such case, were an applicant's request for exemption to be refused then the applicant would be entitled to appeal the Committee's decision to the Sheriff.

5. Next Steps

- 5.1 Council officers will monitor the implementation of the policy and will provide a further update in 12 months.

6. Financial impact

- 6.1 Overall the change to conditions will not create any additional costs to the Council budget. The mitigation measures previously agreed (allowing any operator who applies to change their vehicle without paying the normal change of vehicle variation fee) are estimated at £60,000 over four years. This will be contained within the licensing budget.
- 6.2 Any further costs implementing policy changes will be contained within the current ring-fenced income generated from licence application fees.

7. Stakeholder/Community Impact

- 7.1 The development of policy in respect of the licensing of taxis and private hire cars is part of the wider policy-making role for the Council. It is essential that all strategic aims of the Council are considered, and that where appropriate the taxi and private hire car licensing policy is consistent with these aims.
- 7.2 Air Quality Management Areas have been declared at five areas across the city where air quality assessment has identified that UK air quality objectives are not being met.
- 7.3 This policy will reduce the carbon footprint of the taxi and private hire car trade within the city and will contribute to the Council's Sustainable Energy Action Plan to reduce carbon emissions across the city.
- 7.4 The contents and recommendations neither contribute to, nor detract from, the delivery of the three Public Sector Equality Duties.
- 7.5 The contents and recommendations described in this report do not deliver any outcomes relating to the ten areas of rights, nor do they enhance or infringe them.
- 7.6 As a result of Covid-19, Council officers' regular meetings with trade representatives were affected. Meetings have now resumed, and officers met with members of the trade on 1 March 2021, 14 May 2021, and 20 August 2021.

8. Background reading/external references

- 8.1 None.

9. Appendices

- 9.1 Appendix 1 – Taxi and Private Hire Cars Age Limitation and Emission Standards (new policy agreed by the Regulatory Committee on 16 March 2018)
- 9.2 Appendix 2 - Licensing Conditions
- 9.3 Appendix 3 – Correspondence from Les McVay (Secretary City Cabs) and supporting documentation from the Energy Savings Trust

Taxi and Private Hire Cars Age Limitation and Emission Standards Policy.

Taxi or PHC licensed by the City of Edinburgh Council

Age Limit

1. **Effective 30 September 2021** there will be an Age Limit applied to Taxis and Private Hire Cars (PHC) licensed by the City of Edinburgh Council, Subject to meeting normal conditions about roadworthiness, a taxi and PHC can be submitted for test prior to the 10th anniversary of its registration for renewal of licence and can continue to operate until the expiry of that licence period.
2. **Effective 30 September 2021** Any Taxi or PHC which is converted to LPG will be an exception to the above age limit and allowed an additional 4 years of operation. Subject to meeting normal conditions about roadworthiness and 6 monthly compliance test from the vehicles 10th anniversary this will allow a vehicle to be submitted for test prior to the 14th anniversary of its registration for renewal of licence and can continue to operate until the expiry of that licence period
3. **Effective 30 September 2021** to allow any Electric Taxi or PHC, which is not a hybrid vehicle, to be an exception to the 10 year age limit and allow an additional 4 years of operation. Subject to meeting normal conditions about roadworthiness and 6 monthly compliance test from the vehicles 10th anniversary this will allow a vehicle to be submitted for test prior to the 14th anniversary of its registration for renewal of licence and can continue to operate until the expiry of that licence period

In addition to vehicles requiring to meet the above age limits, the emission standards set out below will also apply with the relevant date for both age limitation and emission standards being the earliest date applicable in either category.

Emission Standards

4. **Effective 1 April 2019** no Taxi or PHC will thereafter be accepted for test unless it is Euro 5 or above. Any Euro 0-4 Taxi or PHC which has passed its test and is licensed prior to 1 April 2019 may continue to be operated until its licence expires or **31 March 2020** whichever date is earliest.
5. **Effective 1 April 2022** no Taxi or PHC will thereafter be accepted for test unless it is Euro 6 or above. Separately to this requirement, any Euro 5 Taxi or PHC that has passed its test and is licensed prior to 1 April 2022 may continue to be operated until its licence expires or **31 March 2023** whichever date is earliest.

Taxi or PHC not currently licensed by the City of Edinburgh Council

6. **Effective 7 May 2018**, no vehicle will be accepted for licensing as a Taxi or PHC or as a replacement vehicle for an existing Taxi or PHC licence unless it is either Euro 5 or 6.
7. **Thereafter effective 30 September 2021** no Taxi or PHC will be accepted for licensing as a Taxi or PHC or as a replacement vehicle for an existing Taxi or PHC licence unless it is a Euro 6.

Electric Vehicles

8. Any Electric Taxi or PHC, which is not a hybrid vehicle, to be an exception to the 10 year age limit and allow an additional 4 years of operation. Subject to meeting normal conditions about roadworthiness and 6 monthly compliance test from the vehicles 10th anniversary this will allow a vehicle to be submitted for test prior to the 14th anniversary of its registration for renewal of licence and can continue to operate until the expiry of that licence period.

Hybrid Vehicles

9. Hybrid cars have electric elements to their powertrains but cannot be considered 'electric cars' due to the presence of a petrol engine. The term 'hybrid' is technically quite vague, but in the context of cars almost always refers to a petrol-electric powertrain. This means the car uses a combination of electricity stored in batteries and petrol stored in a tank to propel the car forward.
10. Hybrid cars at time of manufacture / registration all have a Euro rating which reflects the vehicles emissions level.

LPG Vehicles

11. Prior to 2018 licensing conditions prevented the use of LPG vehicles and they had never previously been considered appropriate for licensing. All application to convert existing will be referred to committee for consideration.
12. Any existing vehicle licenced by CEC can be converted to LPG provided that the following can be shown by the operator and that any modification is carried out at the owner's risk:
 - a. It is assessed as safe by the Taxi Examiners;
 - b. it is accompanied by an approval certificate obtained from DVSA; and
 - c. after such conversion subject to meeting normal conditions about roadworthiness and 6 monthly compliance test from the vehicles 10th anniversary this will allow a vehicle to be submitted for test prior to the 14th anniversary of its registration for renewal of licence and can continue to operate until the expiry of that licence period.

Retro Fit / Replacement engines

13. any existing vehicle licenced by CEC can be adapted to Euro 6 provided that the following can be shown by the operator and that any modification is carried out at the owner's risk:
 - a. It is assessed as safe by the Taxi Examiners:
 - b. it is accompanied by an approval certificate obtained from DVSA.
14. In more general term just because a vehicle has been converted does not mean that its Euro 6 will change. DVSA advise that there is no mechanism to reclassify a vehicles Euro once a vehicle is given a euro classification it will always have this and the V5 vehicle registration document cannot be changed in that regard. The Euro rating once issued remains with the vehicle for life.
15. All application to convert existing will be referred to committee for consideration.

After market devices

16. There are a number of aftermarket devices and fuel additives that manufacturers claim can improve fuel economy and/or reduce exhaust emissions. The majority if not all aftermarket devices require ongoing maintenance and do not provide a permanent or fixed solution to emissions accordingly they have not been included within the policy and any application submitted would be dealt with on a case by case basis.

Any applicant for either the grant or renewal of a taxi or PHC licence may request that a standard condition be disapplied in relation to his/her licence. Where an applicant seeks an exemption from the standard conditions in relation to either the age limitation or emission standards then such applications will be referred to Committee for determination on a case-by-case basis and it will be for individual applicants to set out their position as to why the conditions should not be applied. In any such case, were an applicant's requests for exemption to be refused then the applicant will be entitled to appeal the Committee's decision to the Sheriff.

Retirement policy

17. Owners seeking an exemption to policy on the basis of retirement can be dealt with by council officer under delegated authority and given an exemption of up to a maximum period of 1 year dependant on circumstance.
 - a. Owners would have to provide a written declaration that it was their intention to retire and the intended date of retirement.
 - b. Only one exemption can be dealt with under delegated authority
18. It is acknowledged that circumstance can change and any change to retirement plans would be referred to committee for further consideration. In addition, any evidence of bad faith would also be referred to committee with an immediate request to vary terms of the licence and it may also be considered in context of an owner's suitability in terms of the fit and proper test.

Licensing Conditions

Condition 256:

Licensed Vehicles in Edinburgh must be a motor vehicle of a type or model which holds a valid European Whole Vehicle Type Approval as an M1 vehicle, is purpose built for use as a Licensed Vehicle and must comply in all respects with the requirements of any Acts and Regulations relating to motor vehicles.

In addition to the above: -

From **7 May 2018** any motor vehicle to be licensed in respect of a new taxi licence or replacement vehicle under an existing taxi licence will require to be a Euro 5 or 6 taxi vehicle.

From **1 April 2019** any motor vehicle to be submitted for test in respect of either a new or existing taxi licence will require to be (or exceed) a Euro 5 taxi vehicle. Any Euro 0-4 taxi vehicle licensed as a taxi prior to 1 April 2019 may continue to operate until that licence expires or 31 March 2020 whichever date is earliest.

From **30 September 2021** any motor vehicle to be licensed in respect of a new taxi licence or a replacement vehicle under an existing taxi licence will require to be Euro 6 taxi vehicle.

From **30 September 2021** all Licensed Vehicles must be less than 11 years old from the date of first registration (other than a Licensed Vehicle which is an Electric Vehicle or has been converted to LPG). A Licensed Vehicle submitted for test in respect of renewal of a taxi licence prior to the 10th anniversary of its registration may continue to operate as a taxi until the expiry of the licence period following upon renewal of such licence. A Licensed Vehicle which has been converted to LPG submitted for test in respect of renewal of a taxi licence prior to the 14th anniversary of its registration may continue to operate as a taxi until the expiry of the licence period following upon renewal of such licence.

From **1 April 2022** any motor vehicle to be submitted for test in respect of either a new or existing taxi licence will require to be (or exceed) a Euro 6 taxi vehicle. Any Euro 5 taxi vehicle licensed as a taxi prior to 1 April 2022 may continue to operate until that licence expires or 31 March 2023 whichever date is earliest.

Condition 303:

Licensed Vehicles in Edinburgh must be a motor vehicle of a type or model which holds a valid European Whole Vehicle Type Approval and must comply in all respects with the requirements of any Acts and Regulations relating to motor vehicles.

In addition to the above:

From **7 May 2018** any motor vehicle to be licensed in respect of a new PHC licence or replacement vehicle under an existing PHC licence will require to be a Euro 5 or 6 vehicle.

From **1 April 2019** any motor vehicle to be submitted for test in respect of either a new or existing PHC licence will require to be (or exceed) a Euro 5 vehicle. Any Euro 0-4 vehicle licensed as a PHC prior to 1 April 2019 may continue to operate until that licence expires or 31 March 2020 whichever date is earliest.

From **30 September 2021** any motor vehicle to be licensed in respect of a new PHC licence or a replacement vehicle under an existing PHC licence will require to be a Euro 6 vehicle.

From **30 September 2021** all Licensed Vehicles, other than a Licensed Vehicle which is an Electric Vehicle or has been converted to LPG, must be less than 11 years old from the date of first registration. A Licensed Vehicle submitted for test in respect of renewal of a PHC licence prior to the 10th anniversary of its registration may continue to operate as a PHC until the expiry of the licence period following upon renewal of such licence. A Licensed Vehicle which has been converted to LPG and submitted for test in respect of renewal of a PHC licence prior to the 14th anniversary of its registration may continue to operate as a PHC until the expiry of the licence period following upon renewal of such licence.

From **1 April 2022** any motor vehicle to be submitted for test in respect of either a new or existing PHC licence will require to be (or exceed) a Euro 6 vehicle. Any Euro 5 vehicle licensed as a PHC prior to 1 April 2022 may continue to operate until that licence expires or 31 March 2023 whichever date is earliest.

Appendix 3 –

From: Les McVay
Sent: 20 January 2021 12:58
To: 'andrew.mitchell'
Cc: 'cathy.fullerton; 'cameron.rose; 'neil.ross'
Subject: Euro 6 Retrofit

Hi Andrew.

I hope this finds you well and sane during these crazy times we are all going through.

As you know the taxi trade, like many other businesses, is struggling.

City Cabs would like to put a proposal forward to the Regulatory Committee for their consideration at their next meeting concerning the newly approved Euro 6 Retrofit. Could you please advise how we do this during these extraordinary times we find ourselves in.

Please find attached the technical brochure for the HJS SCR retrofit for vans, taxis and light commercials.

This product is fully approved under the Energy Saving Trust CVRAS accreditation (Clean Vehicle Retrofit Approval Scheme). The link to the main page can be found here:

<https://energysavingtrust.org.uk/service/clean-vehicle-retrofit-accreditation-scheme/>

CVRAS-approved retrofit technologies are now widely accepted across Clean Air Zones in the UK. The rigorous testing and continuous performance monitoring required by Energy Saving Trust is unsurpassed and ensures 'better than Euro 6' NOx reduction performance across all drive cycles.

This Retrofit has already been approved in many cities London, Glasgow, Coventry, Birmingham, and Bath.

I hope this gives you some of the information you may need. Transport Scotland have also given their support to this conversion. There isn't a UK city that hasn't accepted CVRAS approved products for its own Clean Air Zones.

The retrofitting of Euro 5 vehicles is a welcome solution for many licence holders facing bankruptcy already.

Nobody can disagree with the benefits of clean air in the city. If this can be achieved sustainably and affordably, this would certainly help our trade through the troubling financial situation we now find ourselves.

would be very grateful if you could give this your attention as soon as possible.

Les McVay
Company Secretary
1 Atholl Place, Edinburgh, EH3 8HP
Tel: [0131 228 7936](tel:01312287936)
Web: www.citycabs.co.uk



From: Les McVay <les.mcvay@citycabs.co.uk>

Sent: 28 May 2021 14:53

To: Cathy Fullerton; Denis Dixon; Cameron Rose; Joanna Mowat; Max Mitchell; Neil Ross; Susan Rae; Donald Wilson; Scott Arthur; Catherine Scanlin; Andrew Mitchell; Catherine Scanlin; Gordon Hunter

Subject: Euro 6 Retrofit

Dear Councillor

I am contacting you in connection with the topic that was discussed at last weeks Regulatory Committee meeting.

The Councillors in attendance agreed to ask the Council Officers to formulate a report regarding the proposal that a Euro6 retrofit scheme can progress to the next Regulatory meeting for the Councillors consideration.

I have enclosed a little bit more information regarding this scheme, and I again refer you and the council officers to the approval of Transport Scotland and the Energy Savings Trust for this scheme.

If I can be of any further assistance regarding this, please let me know.

The Energy Savings Trust is allocating the grant funding for this scheme and, as you can imagine, is proving very popular in the other cities where this grant is available. It would be great if the licence holders in Edinburgh could be allowed to take advantage of this scheme.

Factsheet

- The HJS SCR Retrofit is suitable for Euro 5 engines, typically vehicles manufactured between 2011 and 2016. The retrofit conversion lifts vehicle emissions levels to Euro 6.
- It does not modify or alter the original engine – it is an exhaust after-treatment system that introduces a Diesel Emissions Fluid (DEF), more commonly known as AdBlue.
- (Note that all new Euro 6 diesel vehicles are fitted with this same technology)
- The retrofit conversion is fully accredited in Germany for use in European Low Emission Zones. It is also accredited by Energy Saving Trust for use across UK ULEZ's and CAZ's.
- The Energy Saving Trust publishes a list of approved retrofit solutions. This is known as the CVRAS approval (Clean Vehicle Retrofit Accreditation Scheme). The scheme demands product testing which exceeds the requirements of the original Euro 6 test protocol. This ensures optimum performance under all duty cycles, including the typically low duty cycle of Taxis.

Resources

Link to EST CVRAS Approved Devices:

<https://energysavingtrust.org.uk/wp-content/uploads/2020/10/20210426CVRAS-Approved-Devices-Open-List-Version-35.pdf>

Attachments

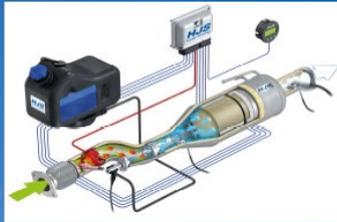
- Cybrand CVRAS Approval Certificate
- HJS SCR02 – Product Approval Certificate
- Generic product technical guide
- Images of the product installed on a Euro 5 Vito Taxi

Les McVay
Company Secretary
1 Atholl Place, Edinburgh, EH3 8HP
Tel: [0131 228 7936](tel:01312287936)
Web: www.citycabs.co.uk



Exhaust Aftertreatment System For Euro 5 > Euro 6 compliance

- SCR Retrofit Emission Upgrade
- To Meet 'Euro 6' Emissions Compliance for London ULEZ and UK Clean Air Zones



Jerry Darlington
6th October 2020

Jerry Darlington | 05.03.2021



Think about tomorrow.



HJS SCR Retrofit System Concept

- System developed in conjunction with Cybrand AEC Ltd, UK Development Partner
- Independent retrofit SCR system → no impact on engine control unit
- OE quality SCR catalytic coatings utilised
- HJS ACU as control unit as used in several OE manufactured systems
- AdBlue dosing strategy is based on sensor signals (temperature, NOx) directly measured in exhaust flow and additional data from engine CAN (engine speed)
- Modular system design for simplified professional installation
- Heating element (thermal management) installed to ensure performance at low operating temperatures

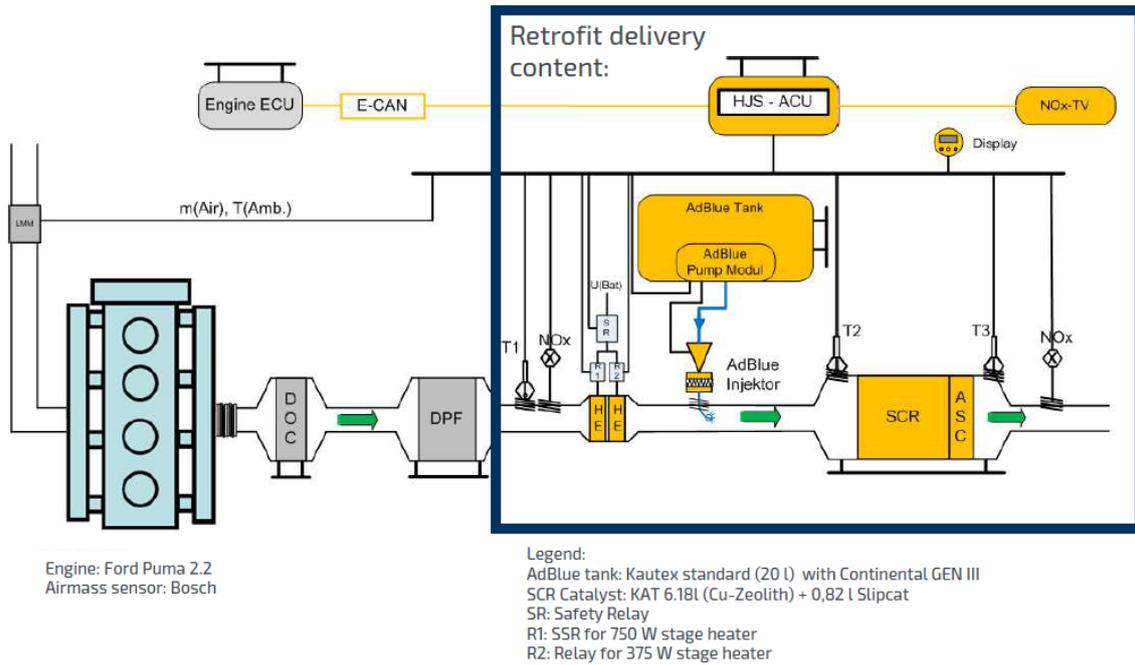
Seite 2 | 05.03.2021



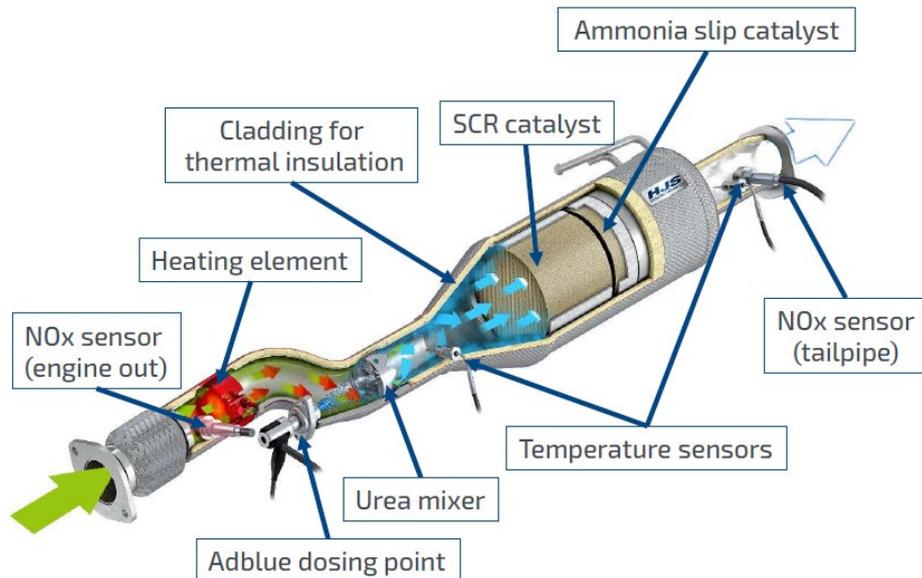
Think about tomorrow.



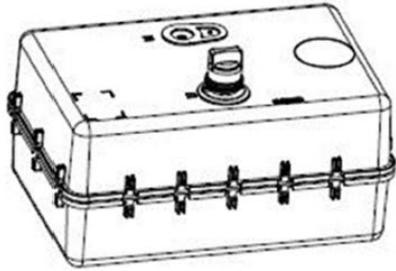
SCR System Layout



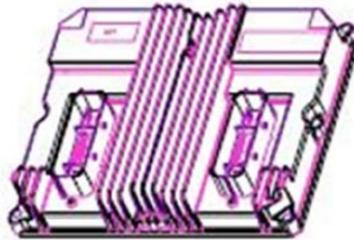
Main System Components



Adblue Tank and Control Unit

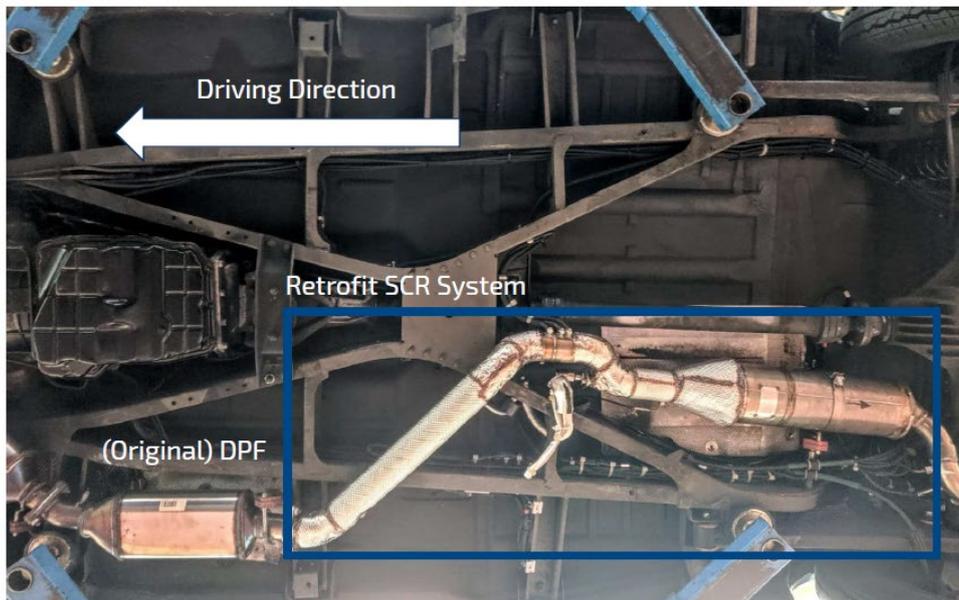


AdBlue tank

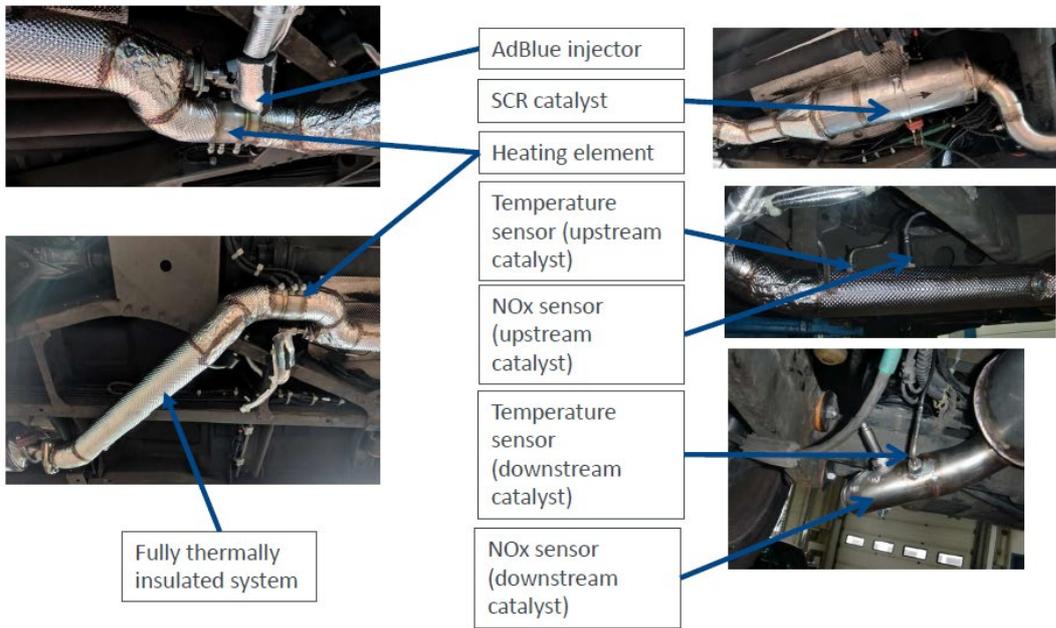


After-treatment Control Unit (ACU)

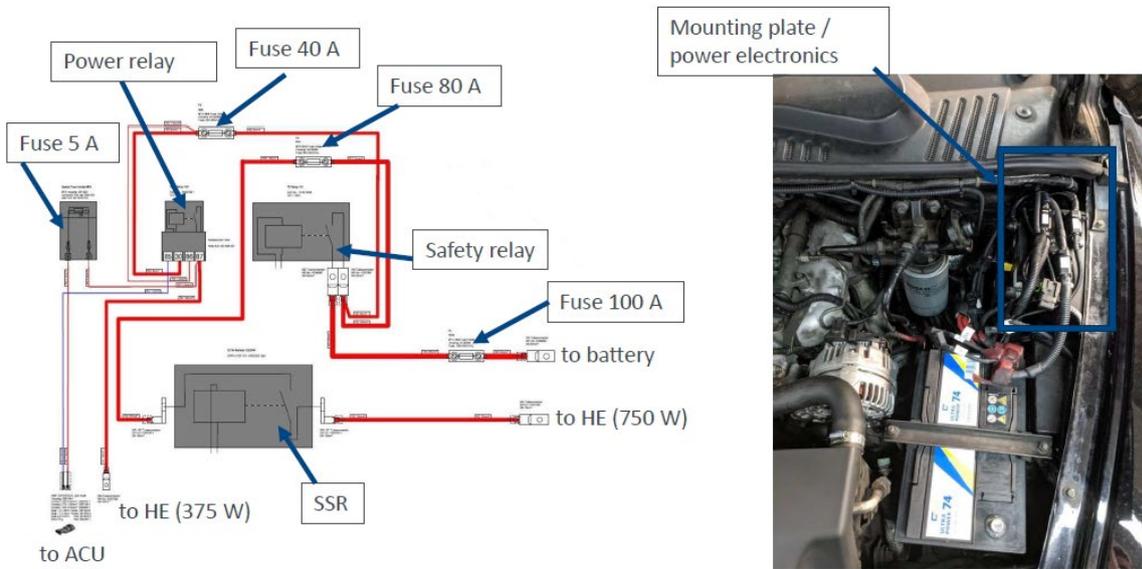
System Installation (example only)



Typical Component Location and Identification



Electronic Components; Location and Wiring (example)



System Diagnostics – Messages on HJS Display 🚗

1. No errors: AdBlue quality and level are OK => HJS SCR System text displayed
2. Emission relevant error => Service text displayed
3. AdBlue level low => Service, Range xxxx and Refill xx l text displayed
4. AdBlue quality poor => Replace DEF (Diesel Emission Fluid) text displayed



Contact UK distributor:

Cybrand AEC Ltd
Thornton Science Park
Chester
UK
CH2 4NU

Tel: +44 (0)1244 567100
Email: sales@cybrand.co.uk
Web: www.cybrand.co.uk





Energy Saving Trust

hereby certifies that the following products:

HJS SCR02

Supplied by: Cybrand AEC Limited under CVRAS company approval number CN-2001

are certified under the requirements of the Clean Vehicle Retrofit Accreditation Scheme (CVRAS), delivered in partnership with the Low Carbon Vehicle Partnership (LowCVP).

CVRAS Product Number: CVRAS-P-1201-02

Certificate Number: CVRAS-PCERT-29

Valid from : 01.12.2020

Valid until*: 30.11.2021

Issue date : 01.12.2020

Refer to www.energysavingtrust.org.uk/CVRAS for listing of approved vehicle applications for this product

Signed 

Programme Manager, Transport
On behalf of Energy Saving Trust Enterprises Limited

Date: 01.12.2020

*This certificate is valid only while the above supplier retains its CVRAS/NRMM Approved Company Status

Delivered in partnership with



Supported by



This certificate remains the property of Energy Saving Trust Enterprises Limited and shall be returned immediately on request.

To check validity telephone +44 (0) 20 7222 0101 or visit www.energysavingtrust.org.uk
Further clarification regarding the scope of this certification maybe obtained by consulting the organisation.

Energy Saving Trust Enterprises Limited Registered Office: 30 North Colonnade, Canary Wharf, London, E14 5GP
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Energy Saving Trust

hereby certifies that the organisation

Cybrand AEC Limited
Thornton Science Park, Ince, Chester, CH2 4NU

is certified under the requirements of the Clean Vehicle Retrofit Accreditation Scheme, delivered in collaboration with the Low Carbon Vehicle Partnership (LowCVP) and Energy Saving Trust Non-Road Mobile Machinery Retrofit Accreditation Scheme (NRMM RAS) requirements.

CVRAS & NRMM Company Number: CN2001

Certificate Number: CCERT63

Valid from : 01:12:2020

Valid until : 30:11:2021

Issue date : 01:12:2020

Signed:



Programme Manager, Transport
On behalf of Energy Saving Trust Enterprises Limited

Date: 01.12.2020

Hi Gordon

Thank you for your time today. Please see attached the current CVRAS accredited solution brochure, you will find the WAV taxis on pg4 for the Mercedes Vito and pg9 for TX models.

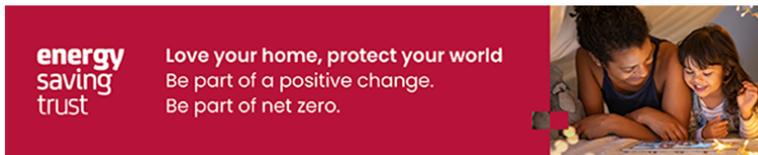
I will reach out to my colleague on the CVRAS programme to check on the Mercedes M8 model and an update on the Peugeot testing.

If you have any other questions, please let me know

Many thanks

Ceit Skinner

Ceit Skinner
Assistant Programme Manager
Energy Saving Trust
Direct +44 1315 559149
Reception +44 (0)131 555 7900
energysavingtrust.org.uk



Good Morning Gordon

I have spoken with Cybrand the UK installer of HJS' exhaust retrofit system, you are correct that the Mercedes Vito solution is also usable in the Mercedes M8, being the alternative model name. Apologies for any confusion caused.

Many thanks

Ceit Skinner

Ceit Skinner
Assistant Programme Manager
Energy Saving Trust
Direct +44 1315 559149
Reception +44 (0)131 555 7900
energysavingtrust.org.uk



From: Gordon Hunter <Gordon.Hunter@edinburgh.gov.uk>

Sent: 18 May 2021 13:07

To: Ceit Skinner <Ceit.Skinner@est.org.uk>

Subject: RE: Taxi Exhaust Retrofit Solutions