BICYCLE ASSOCIATION

UK CYCLE INDUSTRY MANIFESTO

An industry strategy and policies to deliver green jobs and growth, and to drive the rapid electrification of transport

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Image: rbdesignworks.uk

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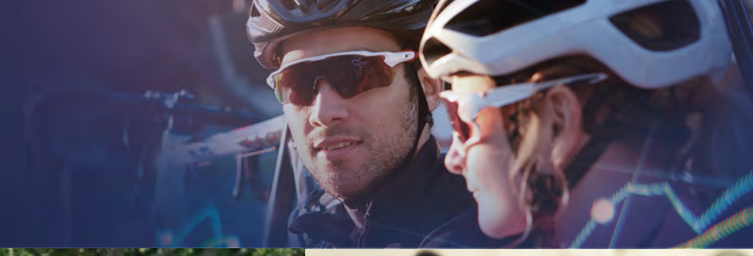

1 One page summary for decision makers

Who are you?

We are the Bicycle Association, the trade body for the UK cycle industry, representing 1200+ companies.

Why should the state support the cycle industry?

Because our products are the fastest and most affordable way to decarbonise a significant part of the transport needs of the UK. And because we are already a strategic industry for the UK's transport future – larger than the steel industry. We provide green jobs in every constituency, with major scope for growth through innovation and new technology.

What are you asking for?

Our Manifesto sets out our policy requests across a wide range of industry areas. We have also identified three "quick win" policy asks:

- **A national e-bike subsidy scheme**
- **Zero VAT on children's cycles, and**
- **Grow UK cycle industry capacity to innovate**

We further propose a wider strategic review across Government to embed the cycle industry in long term planning. With the policies proposed, this will drive substantial industry growth with a five-year timescale.

What will it cost?

Indicative costs for specific policies are outlined in this document. Overall, meaningful change to grasp the economic and industry opportunity could be achieved within just a small fraction of the sustained, substantial investment in safe cycling infrastructure which, we hope, will be supported by future Governments.

When will we see results?

Within months. The Bicycle Association collates detailed monthly retail data and will be able to provide evidence of policy impact on the industry in near real time.

What would success look like?

- **E-bikes and cargo cycles accessible to a wide swathe of the population to enable even more to use congestion-busting, clean independent mobility.**
- **A generation growing up with the skills and appetite to take full advantage of the products and services essential for a cleaner transport future.**
- **A flourishing industry generating green jobs on high streets in every community, with even more jobs in re-shored design, development and manufacturing, capitalising on industry-led innovations.**


Image: raleigh.co.uk


Image: islabikes.co.uk

Accelerate uptake of e-bikes

QUICK WIN POLICY

Subsidise access to e-bikes to accelerate the uptake of this clean, low-impact mode of transport and give 1 million more people access to healthy, low-cost transport by 2030.

Plus: targeted incentives and alignment of VAT, business mileage allowances and scrappage schemes.

Boost deployment of e-cargo cycles for last-mile urban deliveries.

Protect the responsible UK industry by regulating unsafe imports.

Regulate e-scooters for safety and to open industry opportunities.

Widen access to mobility

QUICK WIN POLICY

Zero VAT on children's cycles to ensure every child has access to a bike as they grow up, to prepare a generation for active travel in the clean cities of the future.

Plus: fund access to cycle training for every child, and put cycling on the National Curriculum.

Zero VAT on cycles as mobility aids to open up independent mobility for people with disabilities. Review regulations about use of cycles as mobility aids.

Address cycle theft by resourcing police, and support innovative solutions from the industry.

Grow cycle industry jobs

QUICK WIN POLICY

Build industry innovation capability with a test lab, electrification safety and performance centre, smart tech leadership and innovation-friendly regulations.

Plus: support re-shoring, the industry's sustainable materials and circular economy package, and UK Bike Valley initiative.

Reform business rates relief and reliefs on rent and NI contributions to support the network of cycle retailers and repairers who invigorate high streets in every community.

Support the industry's people: by delivering a National Training Centre and by acting on career mapping, training and qualifications.

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2 Introduction

The cycle industry: a key component of the UK's integrated transport and industrial policies

The UK cycle industry currently contributes ca. £7.5 billion/year[1] to the UK economy and supports ca 64,000 green jobs in the UK [2], ranging from highly skilled roles in design and manufacture to high street retail employment in every community, to a growing workforce keeping the country moving with deliveries by cycle.

It is a green and high-tech industry, undergoing a period of rapid change and innovation as e-bike and e-cargo bike technology goes mainstream.

Right now, the UK cycle industry is uniquely positioned to make a significant contribution to the electrification of transport, through at-scale deployment of bikes, e-bikes and e-cargo bikes.

If its full potential growth is supported and realised the cycle industry could, in the next five years:

- **Provide a clean and low-carbon alternative for up to 5% of personal journeys and 15% of urban van miles [3] - faster and less resource-intensively than any other option for decarbonisation of transport.**
- **Open up access to independent personal mobility across society, addressing issues around cost of living, equity and access to healthcare and work.**

Longer-term, the cycle industry could, in partnership with Government and with supportive policies in place:

- **Contribute significantly towards transport net zero by providing a green, light electric alternative for up to 1.5 billion car kilometres by 2030.**
- **More than double the number of green jobs provided by the industry across the UK.**
- **Multiply many-fold the overall economic contribution of cycling from its current £7.5 billion/year.**

The UK cycle industry is also well placed to take domestic advantage of further growth opportunities in wider micromobility (with its closely adjacent technology) which would follow the introduction of a new regulatory framework for low-speed electric vehicles such as personal e-scooters.

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Representing the UK cycle industry

The Bicycle Association is the trade association for the UK cycle industry, bringing together manufacturers, distributors, retailers and service providers across the UK.

The Bicycle Association speaks for over 1200 companies, spanning ca. 130 full BA member companies and an additional 1000+ "Investors in Cycling" companies (mostly retailers) who financially support the industry advocacy fund managed by the Bicycle Association.

This manifesto was developed and endorsed with the active engagement of over 100 UK cycle industry companies through an open consultation process conducted in Summer 2023.

Industry profile

The UK cycle industry includes household names and iconic brands, among them the twelve companies who make up the Bicycle Association's "Leadership Group".

BROMPTON · CSG CYCLING SPORTS GROUP · FROG bikes · GIANT · halfords · ISLABIKES · RALEIGH · SCHWALBE · SPECIALIZED · SRAM · TREK · wiggle

The UK cycle industry at a glance

STRUCTURE
ca 100 manufacturers
ca 300 distributors
ca 2000 retailers

ANNUAL SALES
ca 2 million bikes
ca 150k e-bikes
ca £2 bn value

JOBS
23k direct jobs
UK wide
Everyday to high tech

INNOVATION
Electric assist
Cycle logistics
Smart/connected

Data sourced from Bicycle Association Market Data Service and research from Transport for Quality of Life[4]

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Why the industry must grow

Electrifying motor vehicles isn't enough

The peer-reviewed literature is clear:

> **"Multiple assessments of whole-economy greenhouse gas reduction pathways, including the latest CCC budgets, have concluded that even if there is rapid electrification over the next 10 years, reduction in car use will also be required in order to meet carbon budgets"[5]**

This means that alternatives to car use must expand rapidly to meet demand. Of these alternatives, only the cycle industry's bikes, e-bikes and e-cargobikes can at the same time:

- **Displace meaningful numbers of journeys**
- **Provide door-to-door personal mobility**
- **Scale swiftly even ahead of costly infrastructure**
- **Scale with minimum environmental impact (both raw materials and in use)**
- **Carry both people and goods.**

The cycle industry can make up the difference

"... a nearly five-fold increase in cycling trips across the UK could make a significant contribution towards reducing car mileage and achieving the UK's carbon targets."[6]

And deliver jobs and economic growth

"...this increase in cycling will bring a green economic dividend ... and between 81,000 and 130,000 additional jobs by 2030"[7]

The evidence case

The Bicycle Association commissioned specialist transport consultancy Transport for Quality of Life to evaluate both the current jobs and economic contribution of the cycle industry and the implications of scaling up, using conservative assumptions and considering only journeys which are realistic to carry out by cycle, to a level required to meet 2030 climate targets.

The UK cycle industry: current economic and employment benefits and decarbonisation-driven growth potential **by Lisa Hopkinson, Transport for Quality of Life, March 2023, is available to download - see references section for the link.**

An industrial plan

This is an industrial growth plan for the UK cycle industry

The UK cycle industry fully supports calls for substantial and sustained investment in constructing safe cycling infrastructure, encouraging behaviour change, and similar Government actions, as essential to enable and attract more people to cycle.

But these measures are not the subject of this document, which focuses on **policy interventions specific to the products and services of the cycle industry.**

As outlined earlier, a wide variety of measures to support cycling (the activity) would be natural consequences of its role in an integrated transport and industrial strategy, as international examples demonstrate[8]. The industry strongly believes that an integrated approach, encompassing both cycling and the cycle industry, is the best way to drive change.

Five year delivery timescale

Our proposals are built around a five year timescale for implementation of the policies proposed.

Note that although widespread implementation of safe cycling infrastructure is vital for the industry to achieve its full potential, industry growth can and should happen ahead of full roll-out of infrastructure improvements.

Measure results with monthly sales data

The Bicycle Association gathers monthly retail sales data from over 70% of the UK cycle goods and services market.

This highly accurate and granular dataset, with regional breakdowns, would be available to measure accurately the effect of any cycle industry interventions in near real time.

Data produced by the Bicycle Association's **Market Data Service** also underpins many of the policy proposals outlined in this document.

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Strategic inclusion, and policy level asks

To unlock growth we propose both strategic priorities and a portfolio of policy proposals over a five-year timescale – with **“quick wins”** highlighted for immediate impact.


Image: **rutlandcycling.com**

Strategic review

The industry strongly believes that **an integrated transport and industrial strategy is essential** to deliver the long-term certainty necessary to unlock both private sector investor confidence and public-sector decision making.

We recommend that high-level leadership within Government institutes an urgent review to ensure that cycling and the cycle industry are explicitly embedded within programmes and strategies cross-Government, including in the areas of:

- **Decarbonisation**
- **Reshoring**
- **Innovation funding**
- **International trade**

We also suggest reviewing any longer-term policy positions around freight, city logistics and transport which were developed before the mainstream deployment potential of e-cargo and e-bikes was evident, to ensure that the full potential of these modes is recognised and taken advantage of for the UK.

Policy actions

The UK cycle industry is calling for its strategic role to be recognised by support:

- **To partner with Government:**
  - **to boost and widen access to mobility for all groups and generations**
  - **to invigorate high streets**
  - **to deliver transport electrification at pace**
- **To innovate:**
  - **in response to technological change**
  - **to deliver against Government objectives including climate change**
  - **to re-shore high value manufacturing and jobs**
- **To roll out those innovations in the UK:**
  - **to deliver UK-wide jobs and economic value**
  - **to develop export opportunities**
  - **to boost public health, independent mobility and quality of life**

We have developed a portfolio of policy proposals to support these objectives, which we outline below, including three headline “quick win” policies for swift implementation.

3 Policies to accelerate uptake of e-bikes

Rationale and key facts

3.1 What are e-bikes and why do they matter?

E-bikes are the lowest-impact form of electric vehicle. They are cycles with a small electric motor to aid your pedalling. They are known formally as Electrically Assisted Pedal Cycles (EAPCs) and can be used legally on road just like a conventional cycle, so long as the rider is aged 14+. The motor must be power-restricted to 250 W and the motor's assistance must cut out at 25 km/h (15.5 mph).

The development of lightweight lithium battery packs has, only in the last few years, driven massive e-bike uptake worldwide. In the EU alone sales now number ca 5 million/year, making a significant impact on transport systems.

E-bikes are also remarkable in their ability to attract people who would otherwise not consider cycling. The gender balance of e-cyclists is much more balanced than for conventional cycling (which is male-dominated), so e-bike roll-out also contributes to equitable access to transport. They can also be transformational for some disabled people and elderly riders, often restoring independent mobility even when walking, or driving, are no longer possible.

The distance that can be covered in comfort on an e-bike in everyday use is significantly greater than for a conventional cycle – making, for example, 10 mile commutes practical, whereas for conventional cycles the practical limit for most people is around 5 miles.

This has significant impact on the ability of cycles to help the UK meet climate targets.

Finally, e-bikes are a key driver of industry growth and jobs. As mechatronic devices they require extensive R&D, advanced manufacturing and skilled technicians for maintenance. Innovation is ongoing in this sector and will drive future UK industry growth.

Why do we need policies to accelerate their uptake if they're so great?

Several reasons:

- **The UK is falling behind: e-bike sales here have remained essentially static for the last three years, while in competitor countries with policies in place to boost uptake they have risen sharply. From rough parity in 2016, France now sells five times as many e-bikes as the UK, following subsidy interventions.**
- **Public awareness and cost remain significant barriers to uptake, despite a highly competitive market to deliver affordable e-cycles.**
- **Without widespread uptake of e-bikes the alternative measures necessary to meet climate targets will be even more difficult and expensive to achieve.**

Would boosting e-bikes be popular?

Yes, we believe so. Many people welcome e-bikes as an affordable and practical alternative to the car for many journeys, and there is also clear public support for measures to meaningfully address climate change. E-bikes are also very enjoyable to use.

What will it cost and is it value for money?

Our key policies proposals are costed on the pages that follow. These are of course indicative figures and could adjust as more or less ambitious policy options are pursued.

Even at the ambitious level, the cost of these policies is very much proportionate in cost to the scale of transport and climate transformation expected, and will also be more than offset by associated industry growth in jobs and economic contribution..

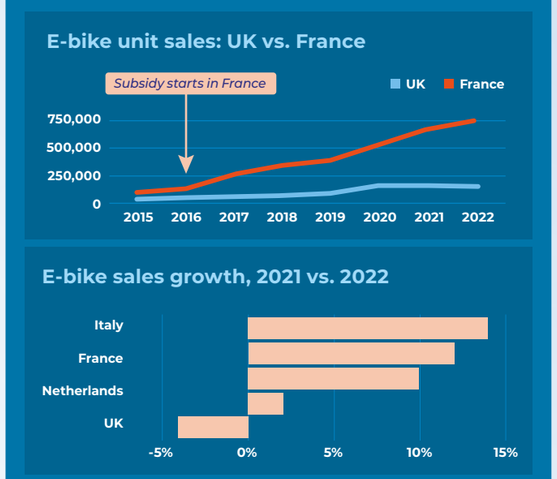
KEY FACTS

150x more raw materials are needed to produce an electric car battery vs an e-bike battery.*

e-bikes have the capability to **reduce car CO2 emissions by 24.4 million tonnes p.a. in England.****

Achieving widespread use of e-bikes as well as conventional bikes could replace **three million car trips to work, and 10% of carbon emissions from commuting.*****

UK e-bike sales vs competitors****



- **The value of the German e-bike market has quadrupled in a decade from circa €2 bn in 2012 to €7.36 bn in 2022**
- **EU e-bike manufacture has seen sustained growth (24% in 2021, 19% in 2022).**

Full links to access reports are provided at the end of this document.

SOURCES:

* Based on conservative calculations of e-car vs e-bike battery capacity[9]. For larger e-cars, the figure may be up to 250 e-bikes.

** Peer reviewed paper by the Centre for Research into Energy Demand Solutions (CREDS), based at the University of Oxford, Feb 2022[10]

*** University of Westminster/Bike is Best report, 2022[11]

**** Bicycle Association Market Data Service and for EU countries, CONEBI industry association reports[12]

3.2

QUICK WIN

A national e-bike subsidy scheme

Accelerate the uptake of e-bikes and give 1 million more people access to clean, low-cost transport by 2030

What exactly is your proposal?

To stimulate growth of e-bikes and e-cargo bikes amongst the general population the Government should introduce subsidies similar to those used in recent years to drive uptake in the wider EV sector.

As a starting point we propose a universal purchase voucher scheme to cover e-bikes, e-cargo cycles and specialist e-cycles for people with disabilities.

We advise structuring this scheme as a voucher to the value of £300 (at 2023 prices).

A voucher delivery mechanism for the cycle industry is already well proven and available following the successful Fix your Bike voucher scheme from 2020 and 2021. With some enhancements as identified in that scheme's recent evaluation report[13] and in partnership with the UK industry, it would be straightforward to repurpose this into an efficient delivery mechanism for e-bike subsidy.

- **We propose this scheme as additional to any existing incentives (such as the Cycle to Work scheme) and it should also be possible for recipients of the voucher to use mechanisms such as retail finance to spread the financial cost, to further reduce the up-front cost.**
- **To ensure the best customer experience and safety, to be eligible, e-bikes must meet all legal requirements as Electrically Assisted Pedal Cycles and have battery packs tested to rigorous safety standards. Clear criteria for eligibility of specialist cycles for use by people with disabilities would be developed in consultation with stakeholders.**

What will it cost?

To give 1 million more people access to e-bikes by 2030, the market must be moved back to sustained growth. An initial 'kick start' from a universal subsidy scheme would mean that this target can be achieved without direct subsidy of the bulk of these additional sales.

We propose an initial fund size of £100 million/year. This will enable £300 discounts for ca. 320,000 e-bikes and specialist cycles.

This subsidy fund would provide a high-profile boost to kick the market into a growth trajectory.

Why a subsidy scheme?

Subsidy is a proven policy to kickstart the e-bike market. It addresses both the initial purchase cost of the e-bike, widely perceived as a barrier to uptake, as well as delivering public awareness and official endorsement of the e-bike as a form of transport.

From the USA[14] to Europe[15] to Australia[16] and beyond[17], countries, regions and cities are using bike and e-bike subsidy schemes to stimulate take-up. There are currently ca. 300 active subsidy schemes in Europe alone.

That's because it works, as a wealth of research has proven. One striking example comes from France. In 2015 e-bikes sales in the UK and France were similar. Then in 2016 France introduced a national subsidy scheme which boosted e-bike sales into an ongoing fast growth trajectory. Now France sells five times as many e-bikes as the UK.

Subsidy-driven growth in e-bikes brings significant economic benefits. For example, the value of the German e-bike market has quadrupled in a decade from circa €2 bn in 2012 to €7.36 bn in 2022.

In many countries subsidies for end users are successfully matched by investment in the industry, delivering jobs in manufacturing, innovation and export capacity. EU e-bike manufacture has seen sustained growth (24% in 2021, 19% in 2022).

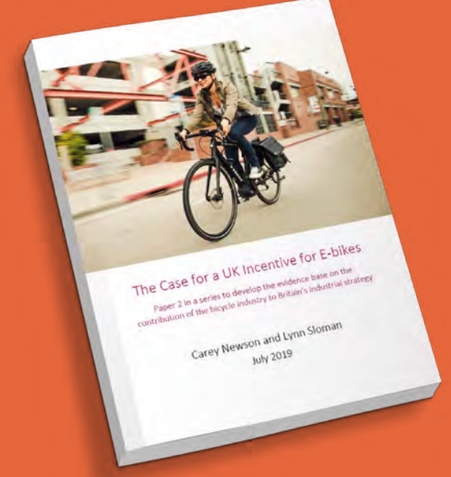
The UK industry can match or exceed this growth - but we need the subsidy now to seize the opportunity

What alternatives were considered?

A number of alternative types of incentives are possible to boost e-bike uptake and we recommend a number of these to run alongside the main subsidy scheme in section 3.5 of this document.

We also recommend that city regions and other regional authorities consider supplementing any national scheme with regional incentive schemes.

The evidence case



The Bicycle Association commissioned specialist transport consultancy Transport for Quality of Life to evaluate the case for a UK e-bike incentive.

The Case for a UK Incentive for e-bikes **by Carey Newson and Lynn Sloman, Transport for Quality of Life, July 2019, is available to download - link provided in References section.**

3.3

NOW

Targeted support for growth: Cycle logistics

The cycle industry's development of innovative electric-assisted cargo cycles is already proving transformative for cities. Major brands including Amazon, UPS and DPD are deploying cargo bike fleets nationwide, clearing van congestion from city centres. Many Bicycle Association member companies are also driving this movement with cycle logistics operations in towns and cities across the UK.

But there is significant scope for innovation and further growth. Multiple sources[18] estimate that ca. 15% of urban centre van miles can be replaced by e-cargo cycles.

This fast-growing industry needs a level playing field, it needs business support for early adopters, and it needs the infrastructure to open access and build momentum. In return, it will deliver the goods.

Regulate and promote high standards for a level playing field

It is vital that this fast-growing sector has regulatory certainty, and that Government insists on high standards from the start.

This will provide a level playing field for responsible operators and prevent irresponsible entrants to the sector undermining its acceptability to the general public, potential clients, and to public sector decisionmakers whose responsibility includes the safety of the public realm where cycle logistics operates.

- **The Bicycle Association has developed, with extensive industry consultation, UK Codes of Conduct for cycle logistics riders and operators, and a minimum standard for cargo bike rider training. Currently, compliance with both is on a voluntary basis. We call on Government to endorse, publish and promote these standards as the minimum expectation for cycle logistics operations in the public realm.**
- **A rider qualification scheme backed by National Standards (along the lines of the Bikeability scheme for general cycle training) should accompany official adoption of the BA Codes of Conduct and Training Standard.**

Use of these Codes of Conduct and Training Standard should be a mandatory condition for any programme of support as outlined below.

With regard to vehicle standards, cycle logistics in the UK has for some years operated with an excellent safety record under the UK's EAPC regulations, and within the UKCA/CE marking product safety framework. Under this framework, the international cycle logistics industry is currently developing updated and specific technical and safety international standards for cargo cycles which are expected to be published in 2024-2025.

We consider it essential that Government commits to co-ordinating any development in national regulations with the international consensus as expressed in these upcoming standards, to provide regulatory certainty and to support suppliers in the industry.

The Bicycle Association also welcomes ongoing dialogue with the Department for Transport to clarify and if necessary to amend the UK's EAPC regulations to reflect new technologies in the cycle logistics sector.

Incentivise green delivery modes

Cycle logistics is one of the lowest-impact modes of goods delivery[19]. But in general, delivery is priced uniformly, with no distinction visible to the purchaser between modes which may have very differing environmental and social impacts.

We propose policies to enable purchasers of delivery services to make better choices:

- **As part of VAT reform (see 4.1) reduce or zero rate VAT on 'green' delivery modes (e.g. 5% rate for electric vehicles, zero for cycle logistics).**
- **Give local authorities powers to develop incentive schemes which might e.g. allow business rates relief for cycle logistics operators and for businesses which reduce their impact on local transport systems by using cycle logistics for local deliveries.**
- **Smart road pricing is likely to be implemented in UK cities in the future. This should be used to implement an incentive structure to reward businesses (and consumers) for using delivery modes which contribute less to emissions and congestion (so size and weight of vehicle would be considered as well as power source)[20].**
- **It should be a priority to incentivise uptake of cycle logistics services. Moving to cycle logistics often involves operational changes to be most effective, so it is important to support initiatives to encourage cycle logistics use, especially by microbusinesses and SMEs, with funding for cycle logistics mentoring and support with operational expertise[21].**

Provide vision and leadership

Government can lead the way in adoption of cycle logistics, pump priming capacity which will be available for the private sector:

- **Implement decisively one or more "Sustainable Freight Demonstration Towns" to showcase urban cycle logistics and to test and refine policies to incentivise use of e-cargo cycle based services to replace vans.**
- **Support NHS and other major public sector buyers to use strategic procurement of e-cargo services in facilities management, transport and net zero plans.**

Invest in cycle logistics friendly infrastructure

Except perhaps on some very busy routes, cycle infrastructure implemented according to the current quality standard LTN 1/20 is likely to be adequate to support cycle logistics use. However, Government should:

- **Support local authorities to address 'bottlenecks' in older infrastructure (likely not to LTN 1/20 standards) which hinders cycle logistics operations.**
- **Empower local authorities to make space available for micro-depots or transshipment hubs to facilitate deployment of cycle logistics.**

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3.4

NOW

Protect the responsible UK industry

3.4.1 NOW: Tackle direct imports and DIY kits causing e-bike fires

Work with us to prevent reputational damage and regulatory uncertainty for e-bikes caused by fire risks from poorly regulated imports and DIY conversion kits.

Recent headlines about e-bike battery fires have been very concerning for the UK cycle industry. Reputable suppliers place on the market only e-bikes which have been extensively tested to well-established standards such as BS EN 15194 and BS EN 50604, and which present only very low fire risk in normal use.

Unfortunately, the responsible e-bike supply industry risks the public perception of its products being undermined by a fire issue caused in very large part, fire services say, by products sourced from overseas suppliers, often via online marketplaces, which do not meet UK or EU standards. These include low quality e-bikes, conversion kits which are fitted to normal bikes to turn them into e-bikes, and third party battery packs and chargers of uncertain compatibility and safety.

None of these poorly regulated imports are anything to do with the responsible industry, nor can the responsible industry control their sale. Indeed, most reputable cycle retailers refuse to work on such products.

So the UK cycle industry needs Government to address this issue firmly and effectively. The Bicycle Association is already working closely with officials at the Department for Transport, the Office for Product Safety and Standards and others, and is supporting ongoing research into this issue which will inform future regulations as soon as possible.

We urge Government to implement appropriate regulations without delay once the OPSS research is complete, and to ensure that any regulatory changes effectively address the root cause of the problem – which we believe to be these unregulated imports – and do not impose unnecessary regulatory burdens on the responsible UK industry whose products are already overwhelmingly very safe.

The UK cycle industry also fully supports economy-level reforms to address these issues:

- **Introducing requirements for overseas sellers supplying direct to UK consumers either to have UK representation via which they can be held accountable, or to use an online marketplace which takes on this role**
- **Require online marketplaces to take on liability risk in the UK for the safety of products ordered through their portals**
- **Resource border and product safety authorities to step up sampling and enforcement.**

Additionally, fire services have suggested that the app-based food delivery sector is of particular concern due to the prevalence of riders using high-risk e-bikes created via DIY kits and components imported via online marketplaces. Therefore, the BA also calls for legislation to ensure that food delivery app operators take responsibility for the safety of equipment used by their riders.

3.4.2 NOW: Tackle unregistered e-motorbikes and tampering

Raise public awareness of the fundamental difference between safe, road legal e-bikes and dangerous unregistered e-motorbikes. Back our stance on tampering and de-restriction with legislation.

In a number of tragic incidents in Summer 2023, “e-bikes” were reported as having been involved in a number of fatal incidents. The subsequent coverage resulted in damaging confusion about what is a road legal e-bike and what is not.

Again, the responsible e-bike supply industry risks having its products confused with illegal items entirely outwith its control, threatening the public acceptance of e-bikes as a form of transport.

Reputable e-bike suppliers sell only e-bikes which meet the strict UK rules for an “Electrically Assisted Pedal Cycle” (EAPC). These must have working pedals, are limited to 250W motor power and the assist motor must cut out at 15.5 mph. In almost every case, the rider must be pedalling for the electric assist to kick in.

In contrast, some of the vehicles involved in recent incidents (and mis-reported as “e-bikes”) were in fact unregistered electric motorcycles with much more powerful motors and capable of speeds in excess of 50 mph. These are not legal to use on the road.

We urge Government, in its own communications and via its agencies and operations, to communicate clearly to the public the difference between safe, legal e-bikes (EAPCs) and unregistered electric motorbikes.

A related issue is tampering, also known as de-restriction, tuning or ‘dongling’. This is when riders or unscrupulous operators modify EAPCs to go faster than the rules permit, or to have more power, or to require no pedalling. This can take the form of either tampering with an existing EAPC, perhaps using a ‘dongle’ (a device to fool the e-bike’s speed-limiting sensors), or creating a new, illegal e-motorbike from a normal cycle and a DIY conversion kit which exceeds to UK legal limits. Many such kits are supplied from overseas sellers via online marketplaces.

We urge the Government to make it illegal for any person to:

- **Tamper with an EAPC such that it no longer qualifies as an EAPC and becomes an unregistered, illegal motorcycle**
- **Create an unregistered, illegal motorcycle by using a conversion kit which does not meet the EAPC requirements**
- **Supply any unregistered motorcycle other than for tightly defined legitimate uses such as dirt bike racing.**

The Bicycle Association and many of its member companies are signatories to a Europe-wide commitment “Companies against tampering”[22] and we note that France now has a law making such tampering illegal[23], with penalties up to 30,000 Euro. We would support a UK equivalent.

BICYCLE ASSOCIATION

3.5

NEXT

Develop further incentives

A national subsidy scheme (see 3.1) would be most effective in combination with a broad package of incentive measures to grow uptake of e-bikes and to send a strong signal of consistent, priority Government endorsement. These include:

- **Targeted incentives** on top of the national subsidy scheme:
  - **Roll out "Cycling on Prescription" nationwide following conclusion of current pilots[24]. The UK cycle industry stands ready to support.**
  - **Provide additional cost reduction measures to enable more people with disabilities to purchase specialist cycle equipment and/or adaptations.**
  - **Focus additional, enhanced e-bike incentives on:**
    - Low income groups
    - Specific sectors such as carers or health workers
    - Particular locations with air quality or congestion issues
  - **Work to address other barriers to e-cycle ownership, for example by funding provision of cycle hangars where secure storage is not available to residents.**
- **VAT restructuring. As noted at 4.1 in this document, the BA urges Government to zero-rate VAT on children's cycles. The UK risks being left behind by competitor countries when to comes to VAT. Portugal, for example, has from 2023 reduced VAT from 23% to 6% on the supply and repair of bikes and e-bikes,[25] in addition to introducing a direct purchase incentive scheme.**

The UK should, as part of restructuring of VAT to better prioiritise environmental and socially beneficial outcomes, either zero rate or apply the UK reduced VAT rate of 5% rate across all cycle industry products and services. The UK cycle market is highly competitive, with good transparency of pricing (online) for customers, so policymakers can have confidence that VAT changes would lead to sustained improvements in affordability.

- **Business mileage rate: set the rate recoverable for cycles and e-cycles to parity with motor vehicles (£0.45/mile) and extend this to commuting miles.**
- **Public sector procurement: set targets for e-bike and e-cargo bike usage across business and the public sector, covering both business use and staff travel to work.**
- **Scrappage schemes: make purchase of e-bikes or specialist cycles an explicit option in future car scrappage schemes to support congestion charging or low emission zones. We recommend that such schemes provide credits towards only clean and congestion-proof transport purchases (e.g. public transport passes, bikes or e-bikes) rather than simple cash credits which can be spent freely.**

3.6

NEXT

Regulate e-scooters

Open opportunities and secure public safety by properly regulating e-scooters without delay, in a framework which safeguards the attractiveness of cycles and e-bikes which, because the rider must pedal, offer unique public health benefits.

Regulation

The UK cycle industry is eager that the regulatory position of privately owned e-scooters is resolved without further delay. We understand that a regulatory framework is under development at DfT and we would encourage its implementation at pace.

The cycle industry expects that any such framework will include comprehensive technical and usage requirements for any new vehicle categories, which will deliver high levels of safety and a level playing field for responsible suppliers.

The baseline for the performance of throttle-controlled vehicles permitted to use cycle lanes should, in our view, be the speed and acceleration of the typical user of an unassisted cycle. This will minimise performance disparities in shared cycle lanes and ensure that using the existing large fleet of conventional cycles, and e-bikes, is not made less attractive.

Opportunity

There is a window of opportunity for the UK to establish a clear regulatory framework for new forms of micromobility such as e-scooters ahead of our competitor countries in the EU. This would effectively set a regulatory precedent and give UK companies a head start in exploiting the opportunities of these new markets.

The UK cycle industry is well placed to capitalise on the opportunities presented by new forms of micromobility and to use this growth to generate UK jobs:

- **E-bikes and e-scooters are 'adjacent' technically, employing similar lithium battery based drive systems and drive system controls.**
- **The cycle industry has a dense network of retailers providing sales and maintenance in communities across the UK, which could swiftly adapt to serve both types of vehicle.**

See Chapter 5 of this document for more about how the Government can support the UK cycle industry to create jobs through innovation.

4 Policies to widen access to mobility

4.1 Rationale and key facts

The cycle industry has a proud record of providing very affordable transport for those who need it. Sales of new cycles are highly price-competitive. And a used cycle can be purchased affordably almost anywhere in the UK, and if necessary repaired and put into service for little additional outlay. Cycles can have a very long service life, making them both economically and environmentally attractive.

However, the affordable cost of a standard cycle does not mean that everyone can access cycling, and with costs of living rising, for increasing numbers of people even the purchase of a used cycle may be a barrier.

The cycle industry believes that our products offer personal mobility and health benefits, both mental and physical, which should be available to all in society. Such provision will, we believe, reduce other costs to the state (provision of motorised mobility, health services).

We recommend Government supports universal access to cycles.

4.2 QUICK WIN

Zero VAT on children's cycles

Zero-rate the supply of children's cycles for VAT, to ensure every child has access to a bike as they grow up, and to prepare a generation for active travel in the clean cities of the future

Zero-rating children's bikes for VAT would send a strong signal that the Government is committed to equipping every child to learn cycling as a life skill for independent mobility, as an essential, strategic part of the UK's future transport policy.

The current Government target is that 50% of all journeys in towns and cities should be walked or cycled by 2030. We believe that e-bikes can drive this to an even higher percentage.

But to participate fully in this transport future, the majority of the population must have the life skill of knowing how to cycle.

This requires immediate Government action to reverse worrying trends:

- **Just 22% of children currently cycle regularly and there has been a 31% decline in kids' bike sales since pre-pandemic levels.**
- **Nearly 1 in 3 children aged 11-16 don't own a bike - and this is a key factor preventing more kids from cycling to school.**

VAT is the simplest and most effective mechanism for Government to meaningfully address these issues.

It is anomalous that children's cycles are not already zero rated for VAT. Many essential items for young children are zero-rated, for example clothing and footwear. Further transport-related items for children benefit from the 5% reduced rate, such as carrycots and car child seats. Also, many other environmentally beneficial goods (e.g. heat pumps) are zero rated to help encourage uptake.

Extending this approach to children's cycles to support future clean transport options for life would involve only modest sums of VAT revenue sacrificed (ca. £22m annually[26]).

The cycle and child cycle retail market is highly price-competitive, and consumers are well informed about comparative pricing online. Policy makers can be confident that VAT changes will deliver sustained price reductions.

Alongside any economic effect, zero-rating children's cycles would send a strong message from Government to families about the role of cycling as an essential mode of transport and the importance of tacking childhood obesity and of boosting children's physical and mental health, by equipping them for independent mobility.

The UK can take a lead internationally. Portugal has recently reduced VAT to 6% on all cycle sales and servicing, but to our knowledge no country has yet zero rated cycles for children.

If the UK were to implement zero VAT on children's bikes (or even on all cycling products and services), this would deliver a powerful statement of net zero intent with worldwide impact.

4.3

NOW

Improve access to zero VAT for cycles

Currently, only cycling products or services (such as specialist equipment and/or adaptations) which are designed specifically and solely for the use of disabled people are eligible to be sold with zero VAT. In practice, this limits the VAT exemption to very specialist products and services supplied, generally, by a limited number of very specialist companies.

This closes down a very significant opportunity for the industry to supply cycles to help open up independent mobility, and potentially reduce costs, for a considerable number of disabled people.

It also restricts the options for the national network of UK cycle retailers to fully serve the needs of the ca. 24% of the UK population who have a disability.

Many disabled people rely on cycles as mobility aids, but in very many cases the adaptations or designs needed fall short of the very strict definition for VAT zero rating.

For example, adult tricycles are overwhelmingly used by people with disabilities or long term health conditions which affect their ability to use two-wheeled cycles. But because these products could also be used by non-disabled customers, they are often not seen as eligible for zero VAT.

Another example is tandem cycles which, when used by a visually impaired or learning impaired second rider, are clearly meeting a need directly related to a disability – but again because tandems may be used by non-disabled riders, they cannot normally be obtained from non-specialist retailers by the disabled person without paying VAT.

We therefore propose:

- **Review and reform the procedures around zero VAT for cycles, accessories and adaptations for disabled people, to ensure that this is simple and straightforward for every disabled person and every cycle retailer to access.**
- **Eligibility for zero rating must be defined on the basis that the product or service will be used to address the specific needs of a disabled person or a person with long term health issues as defined in the Equality Act, without the current implicit or explicit exclusion of products or services which may also be used by non-disabled users.**
- **Currently the retailer may be subject to penalties from HMRC if their judgment about the zero VAT eligibility of a cycling item or service is incorrect. This is a significant barrier to retailers being able to properly serve this market. We propose that the disabled person be made solely responsible for declaring their eligibility for zero rating on the above basis. Any repercussions of incorrect declarations would then be addressed to the person claiming the zero VAT, not to the retailer.**

Reform rules around usage of cycles as mobility aids

Many disabled people use their cycles as mobility aids and depend on them as a vital means of independent transport and everyday mobility. However, this active and health-enhancing way of getting around is significantly limited by lack of formal recognition that a cycle can be a mobility aid.

This means, for example, that a rider who may have difficulty walking cannot access pedestrian areas with the help of their cycle, even only at walking pace. As the Wheels for Wellbeing charity explains[27], this can result in distressing outcomes:

> **"Disabled cyclists regularly encounter difficulties. For instance, of those who use their cycle as a mobility aid, nearly half have been asked to dismount and walk/wheel their cycle, even when it might be physically impossible for them to do so. Typically, this occurs on footways or in pedestrianised areas, where mobility scooters are allowed but cycles and cycling are not."**

We recognise that this is a complex area and that multiple stakeholders are involved, and that valid concerns exist about possible misuse, if access rules were to enable cycles to be classed with other mobility aids.

However, the benefits for disabled people's independent mobility are so great that we believe this issue deserves urgent consideration. It would also open opportunities for the cycle industry to serve a growing market of disabled people for whom, otherwise, a mobility scooter or wheelchair would be the only options.

We therefore urge the Government to develop detailed regulatory proposals to facilitate the use of cycles as mobility aids, in partnership with key stakeholder groups such as Wheels for Wellbeing and the Bicycle Association.

- **One regulatory approach would be to amend the regulations around Class 2 mobility scooters to include cycles and Electrically Assisted Pedal Cycles (EAPCs) but only when these are pedalled at under 4 mph (or, for EAPCs, when used in "walk assist" mode without pedalling). Cycles and EAPCs used in this manner would need to be equipped with a speedometer.**
- **It may also be useful to disabled riders to develop a "Blue Badge for disabled cyclists" scheme, so that third parties who may challenge the use of a cycle as a mobility aid can be reassured that this usage is legitimate. We do not believe that disabled riders should be required to carry such a badge.**

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4.4

NOW

Full access to cycle training, on the curriculum

Internationally, countries are moving towards more active travel – walking, wheeling and cycling. This means that cycling is an essential life skill for every citizen, and that if we do not start now, there will be a generation who, as they reach the age of independent mobility, are not prepared to cycle in cities safely and responsibly.

The answer is for every child to have the opportunity to learn to ride at school, and to ensure this happens, for cycling to be as essential a part of the National Curriculum as swimming.

Fully fund Bikeability training

The UK cycle industry strongly supports the Bikeability cycle training programme, which in 2022 delivered cycle training to ca 500,000 children. It also does excellent work through its "Widening Participation" programme to increase participation amongst teenage girls, children from ethnic minority backgrounds, older children and children living in areas of deprivation.

Industry partners, including many Bicycle Association member companies, support the Bikeability Trust in the delivery of its work.

However, the children it currently reaches are only about 50% of the whole age group cohort. Roll-out of wider availability is proceeding but is dependent on funding.

Therefore we urge Government:

- **To provide secure and sufficient multi-year funding so that every child is offered a Level 2 Bikeability course by the time they finish primary school.**
- **To support Bikeability and local authorities to make adult cycle training widely available for people who wish to cycle now, but who did not have the opportunity to learn to ride in childhood.**
- **Government should support specific provision of cycle training for disabled adults to support the proposed reforms outlined in the previous section 4.3.**

Cycling on the National Curriculum

As an essential life skill cycling should, we believe, be on the National Curriculum as a key part of school age learning for every child. The Bikeability Trust leads in this area and the UK cycle industry gives full support.

This would enable schools to dedicate more time and resources to equipping children for an active transport future.

Cycling on the national curriculum would also be an opportunity to introduce to young minds the possibilities of careers in the cycle industry, and to potentially pave the way towards further vocational training, such as maintenance courses or cargo bike rider training. Read more about our proposals for policies to support cycle industry careers in Chapter 5.

4.5

NEXT

Fund and regulate to tackle cycle theft

Address the scourge of cycle theft with meaningful resourcing for police, and support for innovative solutions from the industry

Cycle theft is a major issue for the cycle industry, and the industry works on multiple fronts to address it.

- **Through technology: new angle-grinder resistant locks, smart locking, GPS tracking and e-bike immobilisers are just some of the recent innovations in this area**
- **Through partnership with police, including on a project to enable unified access to multiple registration databases.**
- **Through retailers, who provide security guidance, registration and insurance services to customers**
- **Through standardisation – with CRWG, the Bicycle Association has co-developed a standard for public cycle parking[28] which especially addresses issues of cycle parking security, hardware quality, durability and proper installation.**
- **Through voluntary cycle registration schemes operated by our member companies**
- **Through business model innovations including shared bikes and e-bikes, subscription and leasing services, and the development of "approved used" and refurbished cycle ranges to provide guaranteed non-stolen used cycle options.**

However, many aspects of cycle theft are beyond the industry's ability to address, and we therefore call on Government to:

- **Resource police to prioritise both personal cycle theft and thefts from cycle retailers, which may involve organised crime.**
- **Further, support police (with legislation if necessary) in their work to address sales of stolen goods including cycles via online marketplaces.**
- **Fund and deliver the single point of access system for cycle registration schemes, and potentially open it for public access to check whether a used cycle is marked stolen.**
- **For all public sector funded schemes around procurement or purchase incentives for cycles, include in the scope of the incentive scheme the purchase of an adequate lock, and provision of security guidance.**
- **Officially adopt the BA's cycle parking standard and make compliance a condition of procurement, installation and maintenance of public cycle parking provision.**
- **Support local authorities in providing secure, high-quality public cycle parking provision commensurate with the growing use of cycles for urban transport.**
- **Review sentencing guidelines for cycle theft offences and ensure that these have a proportionate deterrent effect.**

BICYCLE ASSOCIATION

5 Policies to support the cycle industry to deliver green jobs and growth

The cycle industry already supports the employment of ca 64,000 people across roles from engineering and design, to marketing and business, to logistics to retail and cycle maintenance. These green jobs are spread across the UK, often at the centre of communities.

But with investment and a trading environment which favours cycle sector investment in the UK, there is potential for very significant growth. As we will outline, there are opportunities through:

- **R&D and innovation support – to build industry innovation capability, to re-shore value, to establish technical leadership**
- **Workforce development. In skills, careers and diversity**
- **In boosting high street retail: through planning, through business rates**
- **With Government support we estimate that the cycle industry can double the number of green jobs it provides by 2030.**

Image: **balfesbikes.co.uk**

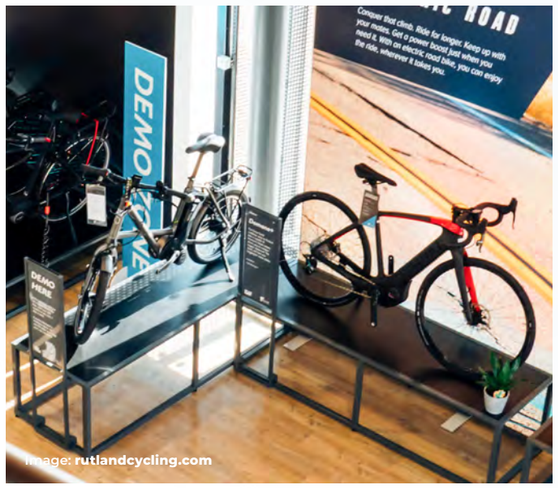

Image: **rutlandcycling.com**

5.1

QUICK WIN

Grow UK capacity to innovate

Invest in UK R&D capabilities that are absent or insufficiently developed – for the testing, production and assembly of bikes, e-bikes, e-cargo and low-speed electric vehicles (LZEVs)

The UK cycle industry is missing key capabilities, affecting our ability to innovate.

Currently, there is no UK test lab able to fully test e-bikes (to BS EN 15194) and Bicycle Association members report having to send samples overseas for testing. This routinely adds five-figure sums to R&D costs, and weeks to product development cycles. Yet other countries have invested in test labs as key parts of cycle industry growth plans[29].

Further, the UK industry is already starting to prepare for the introduction of a framework for the development of Low Speed Zero Emission Vehicles (LZEVs), which is expected to legalise the use of privately owned e-scooters and, in future, new classes of micromobility vehicle. A Performance and Safety Centre dedicated to the batteries, power electronics and drives used in these vehicles would support innovative new products from UK companies.

Increasingly too, road vehicles need to be digital natives and to be ready to connect with “Intelligent Transport Systems” (ITS) – the ecosystem of interconnected computers in every element of the transport network which has the potential to revolutionise:

- **transport efficiency, by e.g. enabling real-time routing to avoid congestion, pollution or accident blackspots**
- **safety, through real-time communication between cycles, road infrastructure and other vehicles**
- **and security and cycle theft prevention, by e.g. building on the existing capability of connected e-bikes to be remotely deactivated and GPS-tracked.**

Therefore we urge Government to:

- **Fund provision of a full service standards-based test laboratory for e-cargo, e-bikes and LSZEVs.**
- **Scope and fund an Electrification Safety and Performance Centre for e-cargo, e-bike and low-powered EVs**
- **Scope and fund work to ensure the UK industry is supported to innovate and to be fully represented internationally in the development of connected cycling and ITS (intelligent transport systems).**

Finally, innovative vehicles will need to be real-world tested, for example to provide safety evidence cases for new categories of innovative vehicle under the LZEV framework. As this would be ahead of legislation to make such a category road legal, a “regulatory sandbox” is necessary where experimental vehicles can be trialled under special conditions.

- **We therefore urge Government to support the ongoing proposals for a Regulatory Sandbox for Low Speed Zero Emission Vehicles (LZEVs) with West Midlands Combined Authority.**

BICYCLE ASSOCIATION

5.2

NOW

Rates relief and more to boost high street retailers

Support the network of cycle retailers and repairers who invigorate high streets in every community

The UK cycle industry relies on a network of ca 2000 retailers and mobile mechanics across the country to sell and maintain its products, and to deliver services. These outlets face substantial competition and rising costs from rents, wages, rates and utilities. Many are very small or micro-businesses, with little capacity to absorb further headwinds.

We urge Government to urgently pursue policies which support the sustainable growth of this sector.

The Bicycle Association strongly endorses calls for support measures for retailers in general, for example from the Federation of Small Business[30] and BRC[31] which call for:

- **Freezing current inflation-linked increases in business rates**
- **more frequent revaluations of properties for business rates, to protect small businesses from sudden large rises in rates, and for**
- **an increase in the threshold for Small Business Rates Relief (SBRR) from £12,000 to £25,000 rateable value. This change would benefit over 200,000 small businesses by lifting them out of the rates system altogether.**

However, cycle retailers deliver some very specific benefits to the high streets and wider communities in which they operate.

- **The cycle industry is a jobs-intensive industry, typically providing twice as many jobs, on a turnover basis, as automotive manufacture and sale.[32]**
- **Cycle retail is a major contributor to vitality and independent retailer diversity on high streets**
- **Cycle retail, with sales and repair available in every locality, is key to supporting cycling as a strategic part of transport**
- **Cycle repair is an essential service and a key element of the country's transport resilience infrastructure (as proven during the pandemic)**

As walking, wheeling, cycling and micromobility grow to become the primary form of transport for local urban journeys, that vital local presence for support and repair is ever more important. Local matters – so that support is available within practical cycling or walking distance of people who may not have access to other forms of mobility.

We therefore call on Government to implement specific support measures for cycle retailers including:

- **Full business rates relief for all cycle repair and service locations**
- **Access to reduced public sector premises rents**
- **Employer National Insurance contributions relief for all qualifying cycle retailers nationwide, similar to the benefits available to businesses located in freeports[33]**

5.3

NOW

A National Training Centre and careers support

Support the industry to develop career mapping, training and qualifications to attract and upskill an increasingly diverse cycle industry workforce, and deliver a national training centre

To be able to grow and deliver the green jobs and transport options the UK needs, the industry needs a sustainable workforce recruitment and retention structure to address skills shortages in key roles.

This means attractive career paths, a professional training and qualification framework, and excellent facilities to learn.

A key focus for the UK cycle industry is to improve the diversity of our workforce. A recent Bicycle Association perception survey[34], supported by international partners, clearly laid out that the diversity of people employed in the industry has a long way to go before it fully represents the population we serve with cycle products and services. Better diversity is key both to unlocking growth with new audiences, and to addressing the industry's own staff shortages.

The industry has qualification structures and accredited training in place, but if cycling is to grow substantially there is a need for a step change with Government support.

We therefore call for:

- **Support for industry work to quantify and address current and emerging skills gaps, for example through a T Level and/or apprenticeships in electromechanical vehicle technologies.**
- **Co-funding of a UK Cycle Industry National Training Centre, potentially with regional training hubs. This would be a flagship facility for the UK cycle industry, providing a real sense of mission and inclusion with the industry's green products and services.**

The National Training Centre would enable the industry to address a number of specific challenges, as well as building diversity into all aspects of its operation:

- **New e-bike technology means electromechanical expertise is now essential for cycle technicians, and a national centre would support this up-skilling with world-class facilities, with opportunities to partner with e-bike drive system providers.**
- **The Centre would additionally be a centre of excellence to develop qualifications and courses for high-skill roles within the industry e.g. cycle designers, compliance & homologation engineers, supply chain and logistics experts, and business roles including sales and marketing, management and sector leadership.**
- **The Centre would additionally support the introduction of a National Standard for cargo bike rider training (see chapter 3.3).**

BICYCLE ASSOCIATION

5.4

NEXT

Reshore and boost the circular economy

The cycle industry is international. Once, the UK was a cycle manufacturing powerhouse, but in recent decades the UK market has largely (ca. 95%) been supplied by imports, mainly from the far East. And the UK is a significant market, selling over 2 million cycles a year.

But that model is coming under increased pressure. Long supply chains are vulnerable, and consumer pressure on brands to source raw materials and labour responsibly are increasing interest in re-shoring cycle assembly and manufacture in a more sustainable manner.

This opens multiple opportunities to re-shore value, to grow the UK cycle industry and to establish international leadership. We call on Government to:

- **Co-invest in a detailed scoping study into the UK's potential to re-shore cycle industry supply chain value.**
- **Provide Government backing for "Bike Valley" – a concept bringing together, developing and promoting internationally cycle industry innovation clusters across the UK's nations and regions including West Midlands, Scotland and Wales. These clusters are based around existing hotspots of cycle industry enterprise and innovation in:**
  - vehicle design and production
  - electrification, and
  - 'greenshoring' manufacturing and assembly, including use of highly automated assembly capabilities (UKRI, Innovate UK, HVM Catapult and Make UK have already supported proposals)
- **Mirror the automotive sector with measures to support supply chain development and a range of collaborative research and development (CR&D) investment, with competitive funding mechanisms for business and public authorities, and attract foreign direct investment (FDI) to the UK.**
- **Scope and fund a UK cycle industry materials and circular economy package:**
  - Instigate a world-leading circular economy initiative to capture and re-use high-grade aluminium used in cycle frames at end of life, avoiding large environmental costs of sourcing this material in and transporting it from the Far East.
  - Support development of a sporting goods cross-industry partnership for carbon fibre end-of-life re-use and recycling.
  - Maximise adjacent industry capabilities to expand lithium battery safety, performance, reuse and recycling, building on the Bicycle Association initiative to set up a voluntary waste battery collection and recycling scheme for the UK e-bike industry.

Image: **frogbikes.co.uk**

BICYCLE ASSOCIATION

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Image: **liv-cycling.com**

UK CYCLE INDUSTRY MANIFESTO

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