# ZEV Mandate: Getting electric vans out of the slow lane

September 2022

## Executive Summary

Over 4.5 million vans are driven along our main roads and streets, providing a crucial means for people to work, services to run and goods to move. In recent years, the number of vans on our roads has exploded, as have emissions. Emissions from vans are rising faster than from other road transport, increasing by 35% between 1999 and 2019 - with a 76% increase of vans on our roads in the same 20 year period.[1]

Meanwhile, the battery electric van market has lagged far behind that of cars. Weak regulation and manufacturers holding back supply have held the van market back from keeping pace with the ever expanding electric car market. While electric cars account for over 14% of new registrations so far this year in the UK, the electric van market has been stuck in the slow lane at just under 5.5%.

Things are starting to improve, however. In fact, electric van sales have increased by over 50% year on year so far in 2022, and for the month of June, new sales were as high as 7.6%, the third highest month on record - nearly enough to already meet the Government's proposed ZEV Mandate targets for 2024 of just 8%.

No wonder the electric van market is starting to pick up pace though - making the switch from diesel to electric is a no brainer for businesses. Electric vans are already between a fifth and a quarter cheaper to own and run in the UK. With the soaring prices of fuel hitting people and businesses, switching to electric is an easy way for businesses to cut their costs.

This should be music to the ears of the Government, also desperately looking to shore up its energy security by eliminating its reliance on Russian oil. With 19% of our diesel coming from Russia, getting van drivers behind the wheel of an electric model is a key way of meeting this commitment.

However, the Government has a crucial role to play in building on this momentum. The supply of electric vans is what is holding the market back from going faster. The ZEV Mandate provides a key

[1] DfT, Vehicle Licensing Statistics 2021 Data Tables, veh0101. Emissions figures from DfT, Energy and Environment Tables, ENV0201.

opportunity to right the wrongs of previously weak EU regulations and put the electric van market on the right track. At the minimum, the UK should target 15% zero emission van sales in 2024, getting up to around 80% in 2030 (see Figure 7). The current targets of 8% and 52% respectively are well below the level of ambition required to get the electric van market out of the slow lane. At best these targets would be a redundant backstop. At worst they will open up a significant chunk of the market to less developed and more polluting plug-in hybrid vans; a far cry from the "world leading" piece of legislation we were promised. The electric van market is ready to go faster, but it needs a regulatory push to get those vans on the roads; they present the only viable option for zero-emission vans while the hydrogen market remains underdeveloped and a distraction from electrification.

In addition to the triple win of reducing emissions, tackling cost of living and boosting energy security, placing the UK as a global leader for electric vans could provide an additional boost to the economy: by attracting investment and safeguarding and creating new jobs in the automotive industry. The opportunity to bring more electric van manufacturing and jobs to the UK is there to seize, but this won't happen by magic. Setting significantly higher targets in the early years of the ZEV Mandate, making the UK an attractive market for electric van sales this decade, would go a long way to achieving it though.

# 1. Introduction

The growth of a diesel-dominated[2] van sector has been a cause for concern from an environmental perspective. While emissions from vans in the UK make up 16% of road transport greenhouse gas emissions (2019), they have increased 22% since 2009[3] - the biggest growth of any road transport segment. On top of that, vans are a major contributor to air pollution in cities, contributing to 36% of NOx emissions from road transport.[4] Whilst total NOx emissions from cars have fallen in recent years, total NOx emissions from vans have in fact risen by 58% between 2009 and 2019; meanwhile, in the same 10 year period, the van sector has also seen increases in PM10 and PM2.5 from tyre and brake wear (35%) and road abrasion (36%).[5]

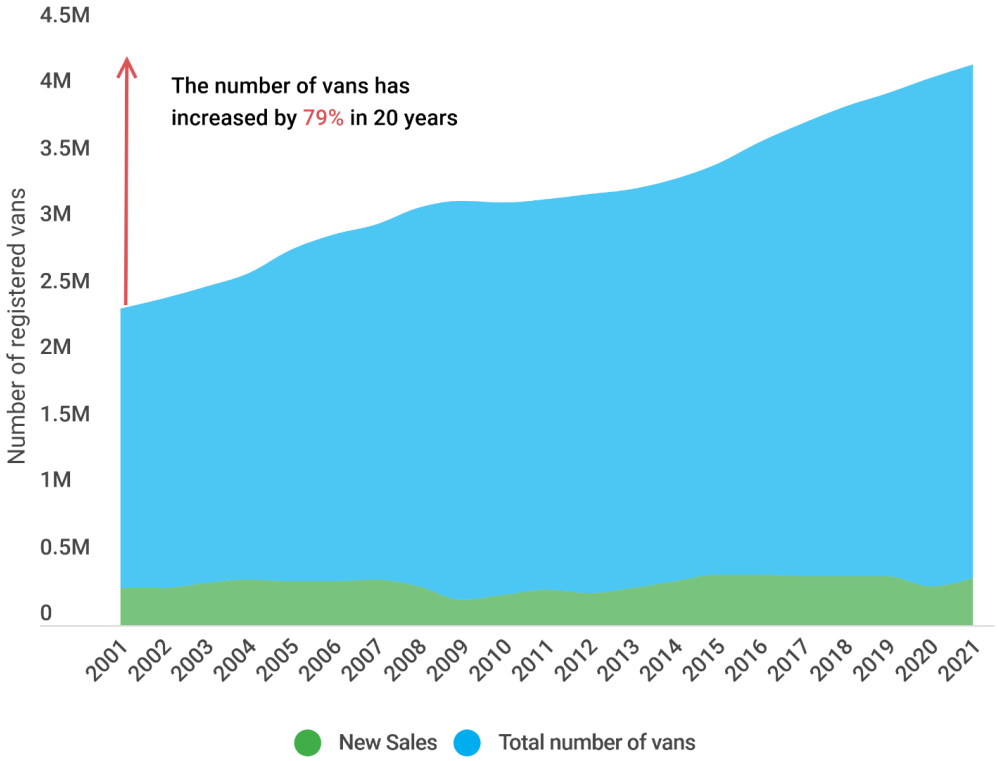
The best way to reduce tailpipe emissions to zero is to switch the UK van fleet from diesel to electric; this will be easier if the fleet is made up of fewer vehicles in total. This briefing will detail how despite a clear financial business case to do so and demand from businesses, electric vans are still stuck in the slow lane.

[2] SMMT LCV Registrations, September - Year to date: Diesel - 92.4%, BEV - 5.3%, Other (e.g. petrol, PHEV, HEV) - 2.3%
[3] DfT, Energy & Environment Data Tables (ENV), ENV0201: Greenhouse Gas Emissions by Transport Mode: United Kingdom
[4] DfT, Energy & Environment Data Tables (ENV), ENV0301: Air Pollutant Emissions by Transport Mode: United Kingdom
[5] ibid.

The supply of electric vans is the main thing holding the market back from rapidly shifting away from diesel. The Government has brought forward proposals for a Zero Emission Vehicle (ZEV) Mandate, setting annual targets for vehicle manufacturers to increase the supply of ZEVs from 2024 to 2035, when all new vehicles sold will be ZEVs. The proposed ZEV Mandate is a major step in the right direction, but the targets for vans must be significantly raised if it is to ensure that more electric vans are sold in the UK. A regulation that will get more electric vans on the roads sooner will reduce road transport emissions, save businesses money and boost energy security.

## 1.1. Van sales

Annual van sales have increased by 30% over the last 20 years (from 274,000 in 2001 to 356,800 in 2021), with the most major drop happening in 2009 after the financial crash, which the van sales market took around five years to recover from. Despite the impacts of the pandemic, van sales bounced back to close to pre-COVID levels in 2021, but figures in 2022 are showing that year to date van sales are 20% lower than this time last year, largely due to the supply chain squeeze - until September, there were eight consecutive months of year-on-year decline in the van market. September marked the first month of market growth in 2022. In comparison, annual car sales have declined by 36% during the same 20 year period, although this is largely due to a significant drop in sales during 2020 and 2021 - excluding the last two years shows an 11% decrease since 2001.[6] Meanwhile, the total number of vans on British roads has increased by 79% between 2001 and 2021.




[6] DfT, Vehicle Licensing Statistics 2021 Data Tables, veh0150

**Figure 1: New van registrations and cumulative number of vans in the UK between 2001 and 2021**[7]

Increasing the share of electric vans should be a priority for the Government's transport decarbonisation plans, particularly if the growth of the van sector continues. New vehicles often stay in the UK's vehicle parc for 15 years - any new van coming onto the roads now will be on our roads until the middle of the next decade. The fewer of these vans that are diesel, the better for the UK's air quality and emissions.

As well as reducing van tailpipe emissions by increasing the share of electric vans on the roads, the Government could explore options to reduce the total number of vans in the UK fleet. Taking action to reduce the number of vans on the roads would help to cut CO2 emissions, as well as tackle issues such as air pollution and congestion. The Government could explore options to reduce the total number of vans on UK roads by providing support for potential solutions, such as:

- E-cargo bikes - offer an alternative to vans across multiple use cases (e.g. deliveries, carrying goods and tools) and are already being rolled out across cities in the UK and beyond. Government could support this rollout with better cycling infrastructure and reintroducing new rounds of the e-Cargo Bike Grant Fund for the bikes themselves.
- Freight consolidation centres - investment in and mandating the use of such centres would help to ensure more efficient use of delivery vehicles, rather than many of them being driven around half empty.
- Express Delivery Tax - levying a tax specifically at consumers unwilling to wait longer for more optimised and consolidated online deliveries could be an effective way of encouraging more efficient delivery methods.

## 1.2. Use cases

Data from 2019-20 shows that over 50% are used for carrying equipment and tools, whereas 16% of vans are used for delivery and collection. Importantly, it is these two segments that also drive a disproportionate proportion of van miles, 61% and 25% respectively. Vans used for delivery and collection of goods have the highest average annual mileage of just over 21,000, compared to 15,500 for vans used for carrying equipment and tools.

[7] DfT, Vehicle Licensing Statistics 2021 Data Tables, veh0150 and veh1103

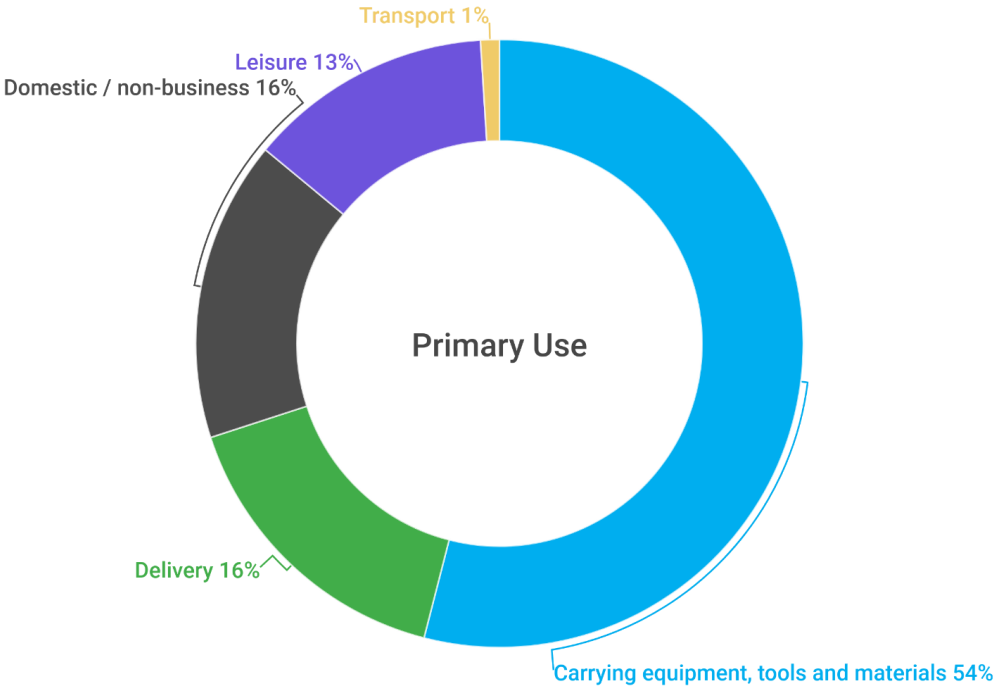



**Figure 2: Proportion of vans by primary use - source**

### 1.3. Van mileage

The 20 year period of 1999 to 2019 saw nearly a 73% increase in van miles, broadly keeping pace with the increase in vans on the roads. 2020 did see a slight drop which can be attributed to the pandemic and associated lower economic activity from tradespeople and businesses. Vans run by businesses drive disproportionately more miles than vans for private use, travelling around 135% more per year (17,500 miles vs 7,400). Despite businesses making up just below 60% of van ownership, they drive over three-quarters of the total mileage by vans.

## 2. Vans powertrain sales - now and future

### 2.1. Electric revolution is underway

Recent years have shown an electric vehicle revolution is underway, both for cars and vans. Electric van registrations were thirteen times higher in Q1 2022 compared to Q1 2017. Although the first three quarters of 2022 show a drop from Q4 in 2021 (a bumper quarter for BEV van sales), this reflects a wider trend of the van market in decline due to supply chain pressures and still shows a trend of

increasing BEV van sales overall.

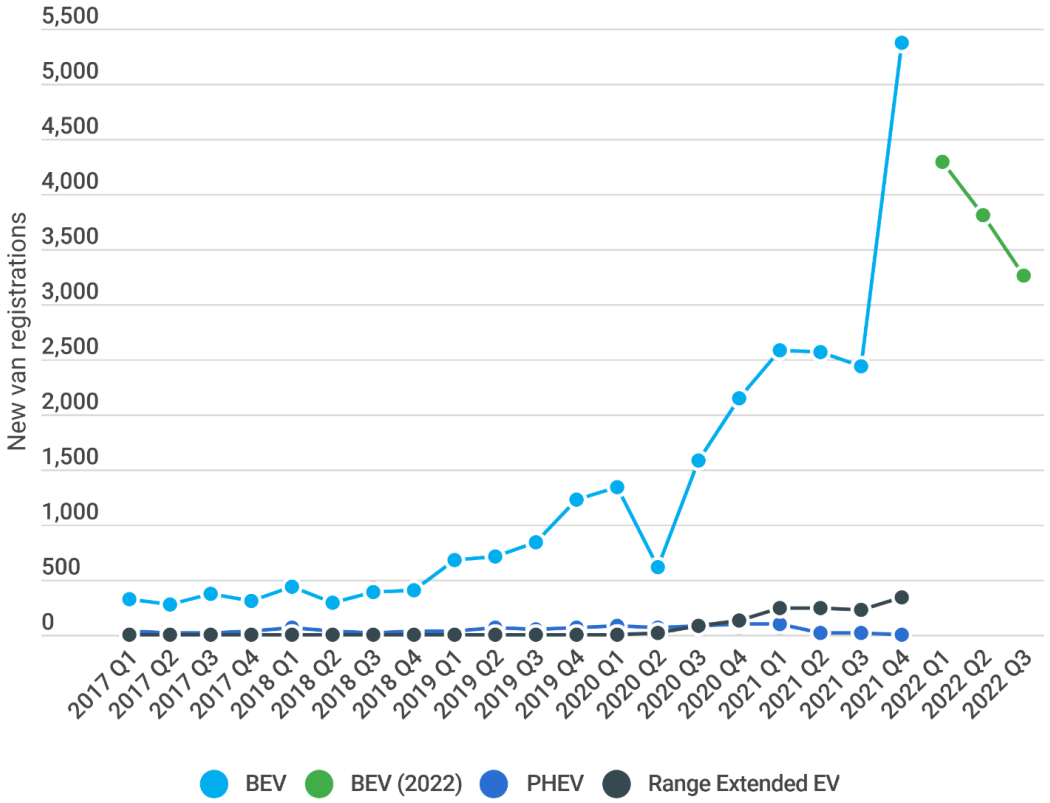



**Figure 3: New quarterly van registrations by powertrain[8]**

## 2.2. Dominance of diesel

Diesel is the dominant powertrain for UK vans, accounting for over 90% of new vans in 2022. Against the backdrop of the Government's commitment to phase out Russian oil imports[9], getting prospective van owners to buy non-diesel vans will be a key way to achieve this. Compared to a non-electrified baseline, the currently proposed ZEV Mandate targets could save around 75 million barrels of oil between 2024 and 2035, or around 18% of the present oil demand from vans. Implementing T&E's higher recommended targets (Figure 7) would save around 115 million barrels, around 30% of the fuel demand from vans[10].

[8] DfT, Vehicle Licensing Statistics 2021 Data Tables, veh0181 & SMMT LCV Registrations

[9] 19% of diesel burned in the UK comes from Russia, DUKES 3.9.

[10] For these estimates, the fuel consumption of new ICE vans was assumed to remain constant from 2021 onwards. The historical average fuel consumption of new vans, average yearly mileage by age and historical sales came from the UK Vehicle Licensing Statistics.

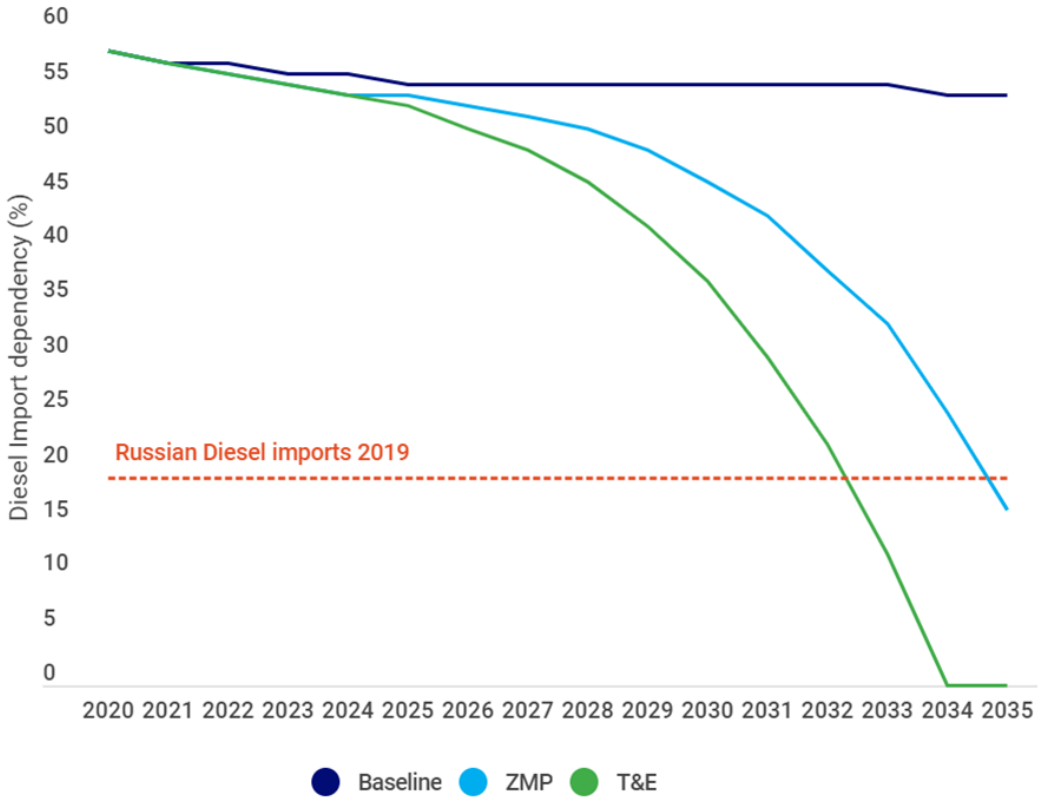



**Figure 4: Estimated trends in the share of fuel for vans that will be imported[11]**

There are signs that the diesel market is starting to decline, however. Whilst the overall market is in decline, electric vans are still on the rise. For the year-to-date in September, electric van registrations have increased by over 50% compared to the same period last year. Meanwhile, in the same period, diesel van sales have declined by 22%. This means that there have been nearly 60,000 fewer diesel vans put on UK roads so far this year, compared to last.

[11]These trends are indicative. Oil demand to 2030 was predicted using the method above. It was assumed that domestically produced diesel will be preferred to imports, and therefore that all reductions in demand will displace imported diesel. Predicting domestic production of diesel is difficult, but it was assumed to remain constant at 2019 levels.

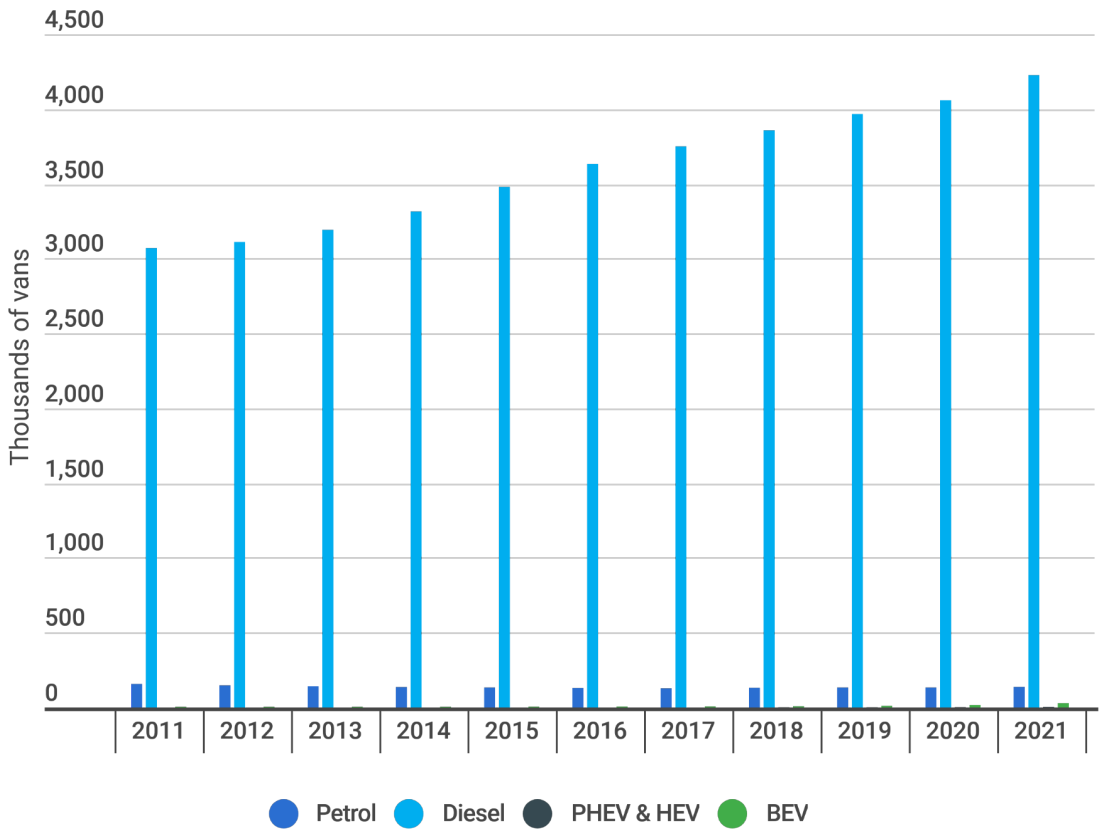



**Figure 5: Cumulative van registrations by powertrain[12]**

## 2.3. No room on the road for hybrids

PHEV vans do not play a significant role in the van market, with diesel and BEV vans equalling nearly 98% of new registrations in 2022 so far, and PHEV and hybrid electric vans only accounted for 0.6% of van orders by fleets in 2021. Research by IHS Markit for T&E found that by 2030, PHEV vans will only make up 2.5% of the total vans produced in Europe. PHEV vans are not competitive on CO2 savings in comparison to BEVs, with an average of 63g CO2/km,[13] while HEV vans only provide a 14% average CO2 saving compared to an ICE van.

## 2.4. Hydrogen is a distraction

Hydrogen is seen by some as a potential solution in road transport, particularly for vans and trucks. It may play a role for some trucks (although electrification is still likely the best option), but it is only expected to play a minimal role for vans. In fact, IHS Markit analysis for T&E shows that hydrogen van production volumes are likely to remain below 1% of van production until 2030, despite several OEMs already making or having plans for hydrogen vans in the coming years. Vauxhall is due to start selling their Vivaro-e Hydrogen model from next year, while UK start-up IVE's hydrogen van model is due to hit the roads in 2024. Meanwhile, First Hydrogen have completed initial testing of their van model. There are,

[12] DfT, Vehicle Licensing Statistics 2021 Data Tables, veh1103
[13] Based on testing under NEDC, under which PHEV cars and vans benefit from generous accounting methods, namely on the assumed share of electric miles driven.

however, no hydrogen van models on the market in the UK currently and it is unclear how many models will be delivered to the market through the announcements above. With only 15 public hydrogen refuelling stations in the UK, it is no surprise that the hydrogen van market is yet to get underway.

Hydrogen will have a far more important role to play in "hard-to-abate" sectors, where electrification is more difficult. Otherwise, the mantra of "electrify everything possible" most definitely applies to the van industry. Where van makers are moving away from diesel production, almost all of the focus is on battery electric vans.

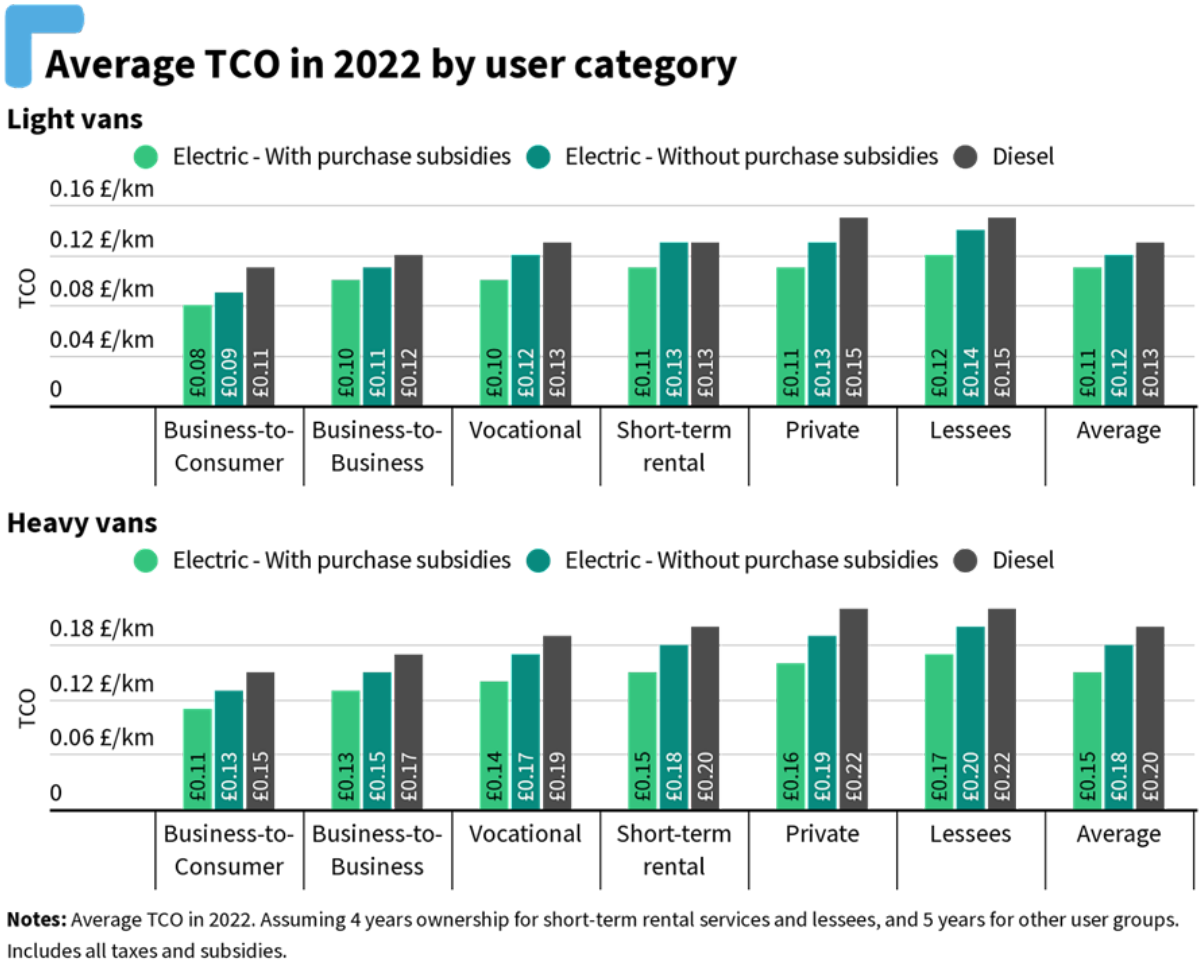
## 3. Total Cost of Ownership of electric vans

In March 2022, T&E published a pan-European total cost of ownership (TCO) study of electric vans, focussed on the UK, France, Germany, Italy, Poland and Spain. It concluded that electric vans are already the best choice for businesses, providing significant cost savings compared to diesel alternatives.

Whilst new electric vans are more expensive to purchase outright than diesel alternatives currently, BNEF forecasts show that the purchase cost of electric vans is continuing to fall, with price parity expected to be reached with diesel vans in 2026 in both the light and heavy segments.

Although they are more expensive to buy, electric vans tend to have lower maintenance (between 12% and 19%) and energy costs, meaning they already reach parity on a TCO basis. Nearly 60% of vans are registered by commercial users, who tend to operate on a TCO basis: looking at all the associated lifetime costs of the vehicle whilst they own it. As soon as the TCO is positive for BEVs in comparison to an ICE van, the market should shift as it makes financial sense (as long as there are not major operational constraints). That point has already been reached in the UK, with electric vans already between a fifth and quarter cheaper than diesel equivalents for average users across the studied use cases, for light and heavy vans,[14] without subsidies, assuming a 4-5 year ownership cycle.

[14] Light vans below 1.76t; heavy vans above 1.76t




**Notes:** Average TCO in 2022. Assuming 4 years ownership for short-term rental services and lessees, and 5 years for other user groups. Includes all taxes and subsidies.

**Figure 6: Study of van TCO in the UK, comparing electric vans to diesel equivalents - source**

Based on economics alone, the cost-optimal trajectory would lead to 100% electric van sales in 2025, when electric vans will be cheaper to own across the board, even when owned for much less than four years.

Electric vans are more advantageous to private and business-to-consumer user groups on average (across light and heavy van segments) with and without subsidies.

T&E analysis of electric van prices in Europe in 2020 showed that heavy electric vans are 42% costlier upfront than diesel, while light vans are 53% more expensive. Equally, maintenance costs for heavy electric vans are 19% lower than diesels, compared to 12% for light electric vans.

## 4. Demand signal for electric vans

Among respondents to Dataforce's survey of van users for T&E who do not already own an electric van, almost half (49%) want to buy one in 2022, with reducing their carbon footprint (75%) and improving the company's image (54%) cited as the top reasons for doing so. 50% of respondents also cite lower total cost of ownership as a reason for buying an electric van instead of diesel.

The EV100 campaign shows that many of the UK's largest fleets are ready to go to 100% EV fleets by 2030. 4 of the 5 largest corporate fleets (BT Group, Centrica, M Group and Mitie) have made commitments to collectively switch approximately 55,000 vehicles (including over 46,000 vans) to zero emission by 2030 at the latest, alongside many other fleets of significant size (including SSE, OVO, National Grid, IKEA, Severn Trent & Schneider Electric). Of those, Centrica, Mitie, IKEA, and OVO have all committed to, or moved their targets forward to be fully electric or zero emission by 2025. Most of these fleets have a significant number of vans. Collectively, commitments from corporate fleet signatories to the campaign stand at over 175,000 vehicles in the UK. Furthermore, a number of the largest leasing companies have also joined EV100 to commit to 100% electric customer fleets by 2030 (e.g. LeasePlan, Lex Autolease (part of Lloyds Banking Group), Zenith). Even beyond the EV100 campaign, other companies are making commitments and progress towards electric fleets. DPD, for example, is aiming for 30-all electric delivery towns and cities by the end of 2023, while Royal Mail has added 3,000 electric vans to its fleet with another 2,000 on the way.

Large fleets will tend to keep vans in their fleets for 3 to 5 years before they go into the second hand market. The sooner electric vans hit the UK roads, the sooner they can be in the hands of smaller businesses and sole traders reliant on the used van market for their vehicles. Utilising the purchasing power of companies committed to electrification is crucial to enable the wider market to switch. But these companies need the van supply if they are to continue delivering on their commitments - lack of supply and availability of zero-emission options is one of the main barriers holding EV100 members back, and as a result have called for a more ambitious ZEV Mandate.

## 5. Electric vans supply

Supply of electric vans is the biggest issue holding back the market from moving faster. EU regulations have been, and continue to be, a lot weaker for vans than cars (e.g. 2020 target 147 CO2/km compared to 118 CO2/km), meaning that in 2025 van makers only need to sell 7% electric vans to meet targets.

The result of this is that across Europe the van market is well behind that of cars when it comes to electrification, leaving businesses unable to purchase the electric vans they want.

There is, however, an increasing variety of vans on offer to electric van buyers. According to LMC Automotive data[15], there are 27 battery electric van models available in the UK this year, compared to just 7 in 2019. More have been announced to hit the market in the next couple of years with available models expected to reach 39 by 2029. Slow progress from traditional manufacturers to move away from diesel production towards electric has led to new players in the market offering electric van options. Major postal provider DHL went to the lengths of setting up their own electric van brand, StreetScooter. Arrival is also a new major player in the space, as well as Chinese manufacturers (such

[15] LMC Automotive, Global Hybrid & Electric Vehicle Forecast (Q2 2022 update)

as Maxus) beginning to enter the UK market. In August, for example, 14% of new electric vans sold were Maxus.

Analysis does show that there are enough electric vans in the pipeline to meet far higher targets than currently proposed by the Government, however. By setting higher targets (Figure 7), the UK can attract surplus electric vans from Europe, due to lower targets (50% CO2 reduction in 2030) set at EU level.

## 6. ZEV Mandate - top of the class or middle of the road?

The electric van market is ready for rapid acceleration, but the targets need to be there to ensure manufacturers prioritise production and sales for the UK market. Without strong targets, van makers may hold back the transition to electric vans in the UK for as long as possible to prioritise selling diesel, despite electric vans offering cost savings for businesses. Under the EU CO2 targets, for example, car manufacturers delayed supplying EVs until they were required to do so and instead promoted sales of profitable ICE SUVs.

The ZEV Mandate can fix this problem, but only if the level of ambition is appropriate. Strong, ambitious targets in the early years of the ZEV Mandate will send the right signal to van makers that they have to accelerate their plans to bring the right electric vans to the market, including models with better towing capabilities, loading capacity and other specifications, as well as making the UK attractive for electric van manufacturing.

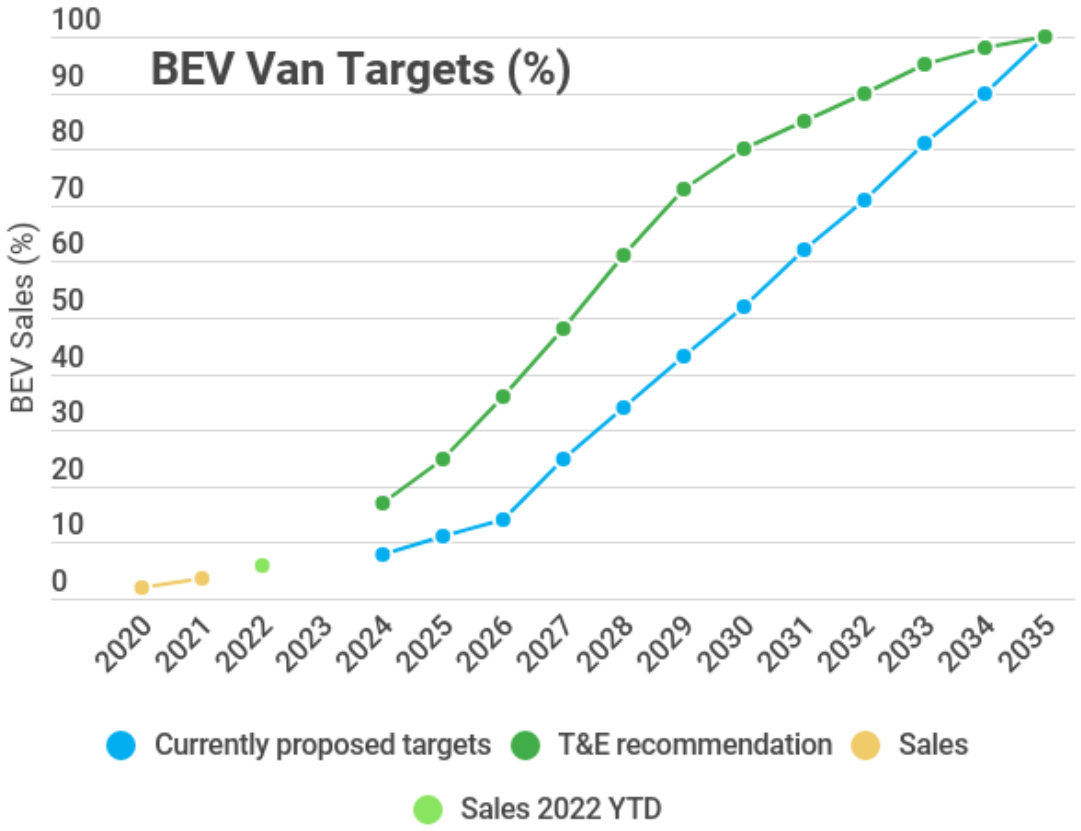
It's clear that already the Government's proposed targets for vans are well behind where the level ambition should be. 8% in 2024 is exceptionally weak given that target has already been met in June this year. The van market is behind that of cars, but it is starting to build real momentum; more better quality models available, more volume and barriers are being removed.

Most purchasers of vans are businesses and so will be more influenced by TCO than upfront cost of a vehicle. With the TCO already tipping in favour of electric vans, it means the market is ready to rapidly shift as long as the supply is sufficient to meet demand. Getting to 100% zero emission van sales by the end of this decade is undoubtedly possible, but regulation must ensure the industry gets us there. We know from previous experience that if regulations are not strong enough, industry will hold back supply of electric vehicles to sell polluting alternatives instead due to higher margins.

The targets proposed for vans are about three years behind where they should be. Although it's understandable to set the initial target at a lower level than cars due to the differing maturity of the electric van market, the targets beyond 2024 must accelerate at a much faster rate than currently proposed. It should be the Government pushing the market, not the other way around. If ambition isn't raised, the Mandate risks being a redundant backstop for the van market rather than a progressive regulatory tool that it was promised to be.

The proposed 2030 target of 52% is particularly puzzling. Since the proposed regulations would mean that no more new diesel vans will be able to be sold after this date, it's unclear what the Government envisages will make up the other 48% of sales. There is a real danger that the proposed targets only serve to support the development of PHEVs which, as set out above, will not play a role in the van market unless the regulation needlessly creates a market for it. The 2030 target also means a significant chunk of people or companies wanting to buy a new BEV van may find it difficult to access them despite them being cheaper for businesses.

Targets in 2024 should be 15% at the minimum, ratcheting up to around 80% at least in 2030.




| Year | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030 | 2031 | 2032 | 2033 | 2034 | 2035 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| T&E updated proposal | 17% | 25% | 36% | 48% | 61% | 73% | 80% | 85% | 90% | 95% | 98% | 100% |
| Current proposal | 8% | 11% | 14% | 25% | 34% | 43% | 52% | 62% | 71% | 81% | 90% | 100% |

**Figure 7: Transport & Environment's recommended ZEV Mandate targets, compared to existing Government proposals - source**

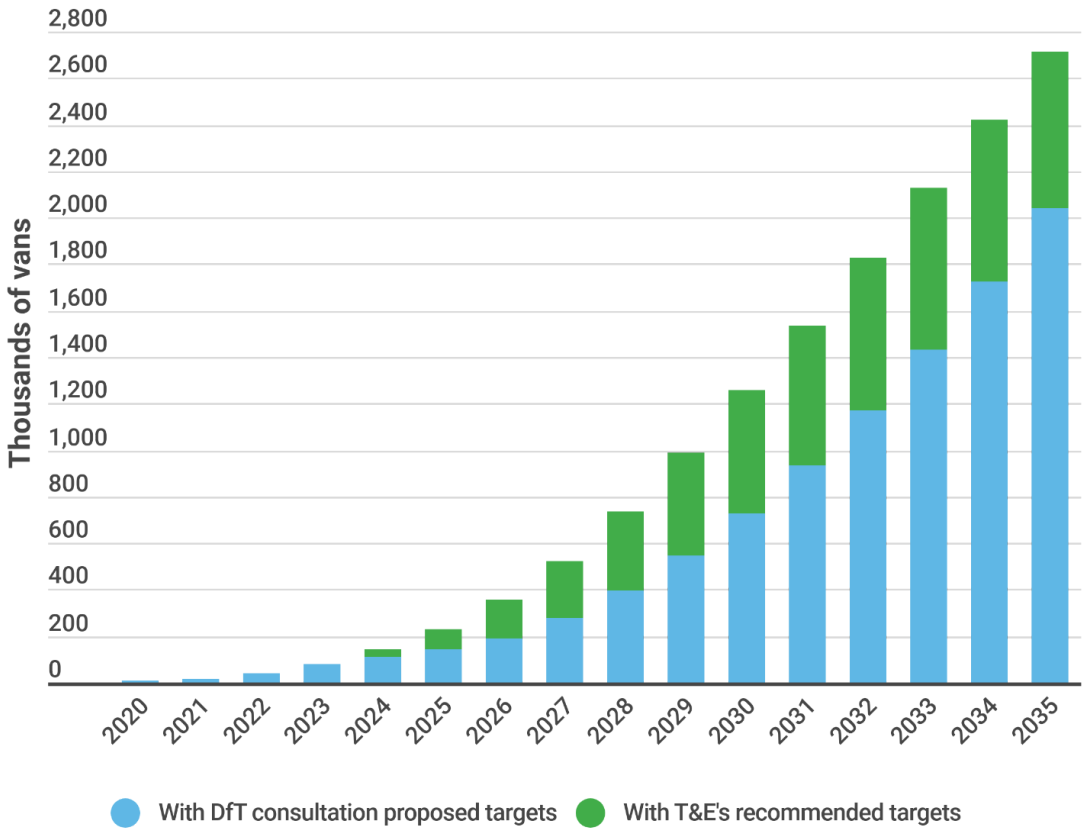



**Figure 8: Projected number of battery electric vans in the vehicle parc with DfT proposed targets and T&E recommended targets.**

There is a real opportunity to rapidly decarbonise our van fleets, cleaning up our air and saving businesses money. Now the financial business case for vans is there, the market is ready to flip very quickly. Now we just need the supply.

## 6.1. A new home for electric van manufacturing?

As well as drawing in surplus electric van supply from Europe and other parts of the world, the UK can increase UK electric van manufacturing and development. Van supply constraints due to lower planned production than cars presents an opportunity for the UK to establish itself as a leading van market. Stellantis' announcement to make its Ellesmere Port plant an all-electric facility, building four different electric van models, was a major step in the right direction. With UK-headquartered disruptor Arrival starting production of its first electric vans this year at its microfactory in Bicester and London Electric Vehicle Company making Range Extended EVs at its Ansty factory in Warwickshire, the UK is slowly becoming a home for electric van production.

The UK's ZEV Mandate should be a major tool to attract additional investment and create or safeguard long-term auto-manufacturing jobs. Setting targets at a much higher level than the EU would, as well as draw in surplus supply, make clear that the UK will be a leading market for electric van sales over the coming years and will make the country a more attractive destination for OEMs to manufacture in. Projections by IHS Markit for T&E in 2021 shows that in 2030, 43% of electric vans made in Europe will be

from France, with the UK following behind Spain (15%) and Germany (14%) at just 9%. Although this means 44% of the UK's total van production is predicted to be electric, it shows that the UK, without the ZEV Mandate, is behind other markets despite having an attractive domestic market for electrification.

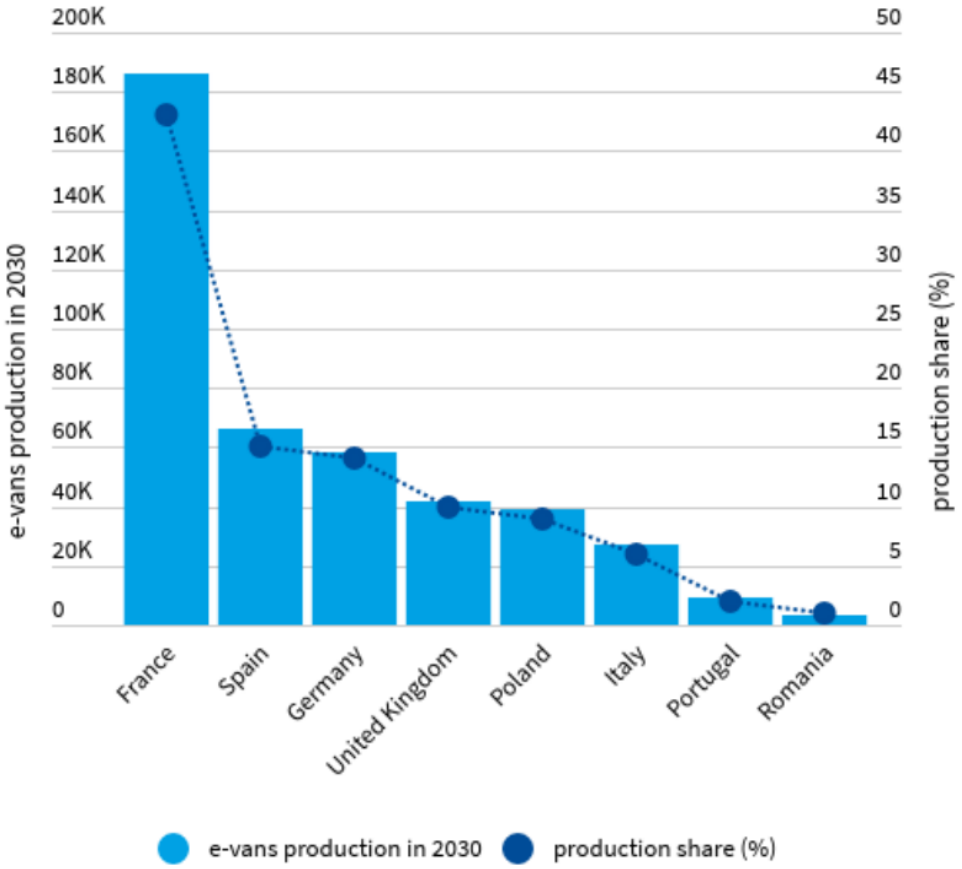



**Figure 9: Predicted geographical distribution of electric van production - Source (2021)**

With Chinese manufacturers, such as BYD, Maxus and DFSK expanding in the electric van market and starting to increase exports to Europe and the UK, it's crucial that the UK doesn't lose ground in the global market. Equally, with these companies expanding, they may be looking for European manufacturing sites - BYD has already set up an electric bus and truck factory in Hungary, as well as setting up a business development site in Buckinghamshire.

The UK has pledged to invest £1 billion through the Automotive Transformation Fund to support the electric vehicle supply chain, including £500 million for gigafactories. The UK must ensure it stays competitive with other countries. Even under current production plans, demand for UK EV battery manufacturing capacity will be over 100GWh per year in 2030, equivalent to five large gigafactories running at full capacity. At present, construction has started on BritishVolt's 38GWh plant in Blyth, Northumberland, planning permission has been granted for Envision's AESC 11GWh plant in Sunderland, while AMTE has set out plans for a 10GWh plant to be operational by 2025. With gigafactories taking at least five years to reach operational capacity, investment and location decisions to meet the projected battery demand in 2030 need to be made very quickly. If the UK fails to do this, manufacturers may decide

to locate future EV production elsewhere. Germany, for example, has 12 gigafactories open or in the pipeline.

A strong ZEV Mandate would help to encourage additional electric van manufacturing by making the UK an attractive sales market which, in turn, will make the business case for further gigafactories far stronger. This could give the UK a major competitive advantage to attract further inward investment, as well as directly creating tens of thousands of jobs.

## 7. Conclusions and policy recommendations

The van sector is a growing cause for concern when it comes to assessing its environmental and climate impact. Numbers of vans on the roads have grown massively over the last couple of decades, as have emissions. Rapidly increasing electrification of vans presents a major opportunity for the UK to tackle the climate crisis and high levels of urban air pollution, at the same time as addressing the cost of living crisis, boosting energy security and attracting investment and jobs.

The UK Government has taken an important first step by confirming that it will introduce a ZEV Mandate, but without higher ambition in its targets the Mandate risks being a redundant backstop rather than the world-leading regulation it promised to be. The Government should commit to raising its 2024 targets for vans to at least 15% and significantly raise its 2030 targets to at least 80% to minimise the risk of opening up a market for inferior PHEV vans.

The demand for electric vans is there - businesses want to buy them as demonstrated through campaigns like EV100. The business case is also there - on a TCO basis, electric vans are already cheaper to own and run than diesel alternatives. So now we need the supply to catch up - this will only happen through strong regulation.

To get electric vans out of the slow lane, we recommend the Government to i**ncrease the ambition of the ZEV Mandate** by increasing its proposed 2024 target to at least 15% and its proposed 2030 target to at least 80%.

## Further information

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