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Energy Saving Trust Response to Department for Transport's Motoring Services Strategy Consultation

Energy Saving Trust is the leading, impartial sustainable energy organisation. We work on behalf of governments and businesses across the UK providing services in the area of data, assurance, consumer engagement, advice and grant administration.

We provide evidence-based advice and ground-breaking research that helps people save energy, every day. Trusted by consumers, businesses and organisations for our expertise and independence, our goal is to find new and better ways to drive change and reduce energy consumption. Public engagement on energy is at the heart of our work and Energy Saving Trust has a unique relationship with the public and communities around energy saving and renewable energy.

The Energy Saving Trust is funded by the Department of Transport (DfT) and the Office for Low Emission Vehicles to provide a range of services to help organisations reduce their transport fuel spend and emissions. These products are aimed at the fleet market and are delivered through a range of channels ranging from in-depth consultancy to online tools. With experts from around the automotive industry, Energy Saving Trust takes a pragmatic view to support organisations in their ambitions to reduce their fuel spend through informed and robust recommendations.

We are the leading independent organisation supporting the uptake of ultra low emission vehicles amongst fleets and work across the sector to promote the acceleration of plug in vehicle sales. Energy Saving Trust is also the UK's top provider of fuel efficient driving advice and training to drivers and organisations with a track record in the UK and Europe of developing fuel efficient driving initiatives.

For the Department for Energy and Climate Change (DECC) the Energy Saving Trust delivers the telephone-based Energy Saving Advice Service in England and Wales. We also undertake other research and awareness-raising work for DECC on a project-by-project basis. Prior to the coalition government, for over 15 years, Energy Saving Trust ran national energy advice services for DECC and predecessor departments as a grant-funded organisation.

In Scotland Energy Saving Trust is the principal delivery partner of the Scottish Government for home energy efficiency. We run comprehensive local and national advice and support programmes.

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Question 1

“As we change the practical driving test to ensure it reflects the modern driving experience, what views do respondents have about how we can maintain standards and give candidates clear information about the competencies tested in the driving test?”

Summary of EST Response

Efficient driving is a generic term that we will use in this document to describe techniques that reduce fuel consumption. These techniques are mainly attributed to the driver of the vehicle and include anticipation of road conditions, suitable gear changes, not idling and other measures.

Efficient driving techniques do not feature significantly in the current driving test. This is a major missed opportunity as these techniques are proven to reduce fuel consumption and emissions and bring additional safety benefits. DfT has been investing in the development of efficient driver training since 2008 and more than 40,000 fleet drivers have benefited from our innovative short form training, developed in conjunction with key European experts including the German Road Safety Council and the International Commission for Driver Testing. In recent years, this support has been in the form of a subsidy paid to driver training companies using 300 DVSA registered Fleet Trainers trained in these techniques by the Energy Saving Trust. Changes to the driving test and instructor training could ensure that trainers and new drivers put more emphasis on efficient techniques. These changes would also improve safety through emphasising greater anticipation.

The continued fall-out from the VW emissions scandal means that the issue of real world miles per gallon performance of vehicles is highly important to legislators, manufacturers and drivers. The planned changes to the driving test represent an opportunity for government to further recognise and reinforce the role of driver behaviour in maximising the efficient use of fuel and corresponding emissions reductions.

Recommendations

The Energy Saving Trust would welcome any changes to the driving test and to instructor Check Tests that lead to greater emphasis on efficient driving for new drivers without compromising safety. We recommend:

1. The driving test should be changed so that efficient driving faults are treated in the same way as other Driving Faults (previously known as Minor Faults) i.e. they should be noted during the test and each should count individually as a driving fault. Multiple efficient Driving Faults should each count toward the total of 16 Driving Faults at which point a candidate fails his or her test.

We recognise that in the past there has been concern from within some quarters at DVSA that any greater emphasis on efficiency might detract from the emphasis on safety. We agree that safety must always take priority, but we believe that efficiency and safety are complementary, and that promoting efficient driving with its financial and environmental benefits will lead to more drivers continuing with safer driving styles post-test.

2. Efficient driving should feature much more prominently in instructor ADI training.
3. Efficient driving should become a mandatory part of the instructor ADI standards check.

Recommendations 2 and 3 should ensure that trainers practice the key techniques of early (low rev) gear changes when accelerating; lifting off the accelerator (but remaining in gear) as early as possible when slowing down, and anticipating as far ahead as possible to avoid unnecessary acceleration and braking. Our experience of training more than 300 Fleet Trainers has shown us that almost all the trainers could already talk about these techniques, most believed they were already employing them, but few were actually able to demonstrate the techniques well. The reason is simple: most trainers never practice the techniques as learner drivers don't ask for them and the instructors' own training and testing doesn't require them. We have consulted with many instructors about this point and they report unanimously that they have never known efficient driving techniques to feature in instructor Standards Tests, or previously in instructor Check Tests).

Implementing these techniques will not be achieved by focussing on safety alone. For example, changing up through the gears at 2500-3000 rpm doesn't necessarily compromise safety but does compromise efficiency. Instructors should therefore also be tested on their ability to drive efficiently.

Strong supporting evidence for recommendations 2 and 3 comes from a recent survey of Fleet Trainers that have attended one of EST's Efficient Driving Train-the-trainer courses: 84% reported that they learned new techniques from the course, and of those that also train learner drivers, 95% report they now incorporate more efficient driving techniques in to their learner driver training.

The Energy Saving Trust & Fuel Efficient Driving

1. The Energy Saving Trust has promoted efficient driving techniques since 2005. We have participated in three EU funded efficient driving projects including ECODRIVEN, a three-year project led by Energy Saving Trust and involving partners from 10 countries. Through these projects we worked closely with leading European efficient driving experts including CIECA (the International Commission for Driver Testing); the European Driving Instructors Association; the German Road Safety Council, national energy agencies and influential driver trainers and examiners from several countries.
2. Energy Saving Trust has undertaken efficient driving initiatives in partnership with vehicle manufacturers including Ford, BMW, Fiat, SEAT and Kia.
3. In England we have run DfT-funded efficient driving programmes since 2008 and in Scotland we have delivered efficient driving training funded by the Scottish Government since 2010. In total Energy Saving Trust has funded efficient driving training for more than 45,000 fleet drivers since 2008.
4. Our current DfT-funded efficient driving scheme involves more than 20 driver training companies including AA DriveTech, the UK's largest fleet driver training organisation. We have trained more than 300 DVSA registered Fleet Trainers at efficient driving train-the-trainer courses.

The Current Situation

1. The introduction of efficient driving to the driving test in 2008 was welcome. However efficient driving is treated differently from other driving faults: Other driving faults are categorised as "Dangerous", "Serious" or as the less serious "Driving Faults". A single mistake from either of the first two categories results in a fail, as does 16 or more Driving Faults. Efficient driving is not counted as a Driving Fault. It is assessed only after the test has finished and the other faults have been counted and recorded. DVSA's ADI1 Standard Operating Procedures¹ states on p.27 that "*the eco-safe driving assessment will **not** influence the overall result.*"
2. Research² for the ECOWILL project – based on interviews with driving instructors - found that efficient driving features very little, if at all, in most new driver training in the UK. All our subsequent conversations with ADIs have confirmed this opinion.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/458928/dvsa-adi1-standard-operating-procedure.pdf

² Overview on the Status of Ecodriving Integration in Driver Education and Testing, EU ECOWILL project, 2011

Instructors report that new drivers are focussed on passing the test and they understand that efficient driving will not affect the test outcome.

3. The majority of Fleet Trainers attending the Energy Saving Trust's efficient driving train-the-trainer courses have surprisingly little efficient driving knowledge and ability. We see this in classroom discussions and on-road training. The techniques we promote at these courses are straight-forward but the majority of trainers do not have a good grasp of them when they arrive and after a small amount of on-road tuition from an Energy Saving Trust trainer see big MPG improvements. This is despite the fact that ADIs attending these efficient driving courses must be on the DVSA's Fleet Register. In a recent survey (October 2015) of trainers attending these course, all reported that they learned new efficient driving information and 84% that they learned new efficient driving techniques.
4. Points 2 and 3 above are linked: trainers are unlikely to practice and develop their own efficient driving skills when there is little demand from drivers for these skills.
5. In addition, efficient driving is not a mandatory part of the driving instructor Check Test and all the ADIs with which Energy Saving Trust has consulted have stated that in practice it does not feature in these tests.

The Opportunity

1. Efficient driving presents an opportunity to reduce transport CO₂ emissions and fuel cost significantly and to contribute to greater safety. Efficient driving and safety are complementary because greater anticipation is the key to both. Since efficient driving reduces fuel costs, it also provides an on-going incentive for drivers to maintain a safer driving style post-test.
2. Empirical evidence for the safety benefits of efficient driving include:
 - A study by Arriva North West in the UK³ in which their bus drivers were given efficient driving training to improve MPG. Ostensibly the training included nothing about safety but in the following 12 months the company recorded a 30% reduction in 'at fault' collisions and an 18% reduction in overall collisions. Arriva NW attributes the reduced collision rates to the efficient driving training.

³ A copy of Arriva NW's presentation summarising the project and its results is available from EST

- Studies from the German Road Safety Council⁴ (DVR) in which fleet drivers' 'at fault' collision rates fell by 35% and total collision rates by 22% in the 12 months following efficient driving training.
3. The German Road Safety Council is a major provider of efficient driving training - using the English term 'ecodriving' - even though their objective is road safety. DVR believes that the potential cost and emissions savings are an effective way to promote a safer driving style.
 4. The environmental case for more efficient training for new drivers is clear: the Climate Change Committee stated in 2013⁵ "Given the benefits to both cost reductions and carbon savings, we recommend the Government should actively promote the uptake of eco-training, through a combination of **inclusion as a key element in the practical driving test**, driver training, awareness raising and in-car information on fuel efficiency" [emphasis added]
 5. EST's own data from training 45,000 post-test fleet drivers shows between 13 and 14% average reduction in fuel consumption on the day of efficient training. Longer term fleet studies find between 3%⁶ and 6.2⁷% reduction in fuel consumption in the 12 months post-efficient driving training. Savings among private motorists might be even greater as they pay for their own fuel whereas most fleet drivers do not.
 6. Driver training companies have had some success selling post-test efficient driving training in but the volumes are small: thousands or at best tens of thousands of drivers per year, compared to approximately 1.6m new driver practical tests. Introducing more efficient driving into new driver training would therefore present an opportunity for a massive scale change in the UK's efforts to promote efficient driving.

⁴ Auf Den Punkt, DVR, 2009

⁵ https://www.theccc.org.uk/wp-content/uploads/2013/06/CCC-Prog-Rep-Book_singles_web_1.pdf

⁶ Energy Saving Trust, Smarter Driving Field Trials, Final Report, 2014

⁷ Auf Den Punkt, DVR, 2009