



New regulations on vehicle number plates and registration format

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1 March 2001

To: All Consultees

Dear Consultee

New Regulations on Number Plates

Further to our letter of 30 March 2000, about proposed changes on draft regulations for the display of number plates, we are writing to let you know that the regulations have now been made.

The new regulations provide for the introduction of a mandatory character font for use on all new number plates, a new size of character for all new non-motorcycle size plates, a new British Standard to make plates more durable and will allow the *optional* display of the Euro-symbol. In view of the delay in making these regulations, the new requirements will now become compulsory from 1 September. However, the new British Standard, font specifications and optional use of the Euro-symbol become legal from 21 March 2001.

The new regulations will also provide for the introduction of a new format (e.g. DE51 ABC) to apply when the existing letter prefix series runs out at the end of August 2001. These will not, of course, be appropriate for use until 1 September.

Copies of this letter, the regulations and Regulatory Impact Assessment are being made available on the DETR web-site at www.dft.gov.uk

We thank you all for your comments and interest.

Yours sincerely

Stephen Clarke

Full Regulatory Impact Assessment:

- **The Road Vehicles (Display of Registration Marks) Regulations 2001**
- **The Road Vehicles Lighting (Amendment) Regulations 2001**

Introduction and Summary

1. This assessment estimates the costs and benefits of the Road Vehicles (Display of Registration Marks) Regulations 2001 and the Road Vehicles Lighting (Amendment) Regulations 2001. It reflects responses to public consultation letters issued in August 1999 and January 2000 about the draft regulations.

2. The main benefits of the new regulations are:

- introduction of a mandatory font for use on number plates (to reduce scope for abuse and allow better enforcement);
- more durable number plates arising from the adoption of a new British Standard;
- plate marking by manufacturers or suppliers which can assist police in detection of serious crime;
- allowing the optional use of the Euro-symbol; and
- introduction of a new registration format, necessary to provide sufficient registration combinations to last for a substantial period when the existing format expires.

3. Around 160 responses from individuals and organisations were received to the consultation letters. Respondents included number plate manufacturers and suppliers, the motor trade, vehicle operators, police, local and central government bodies, road safety and other interest groups. The industry respondents included firms with both large and smaller market shares. Comments were also received from the European Commission and one Member State.

4. A draft Regulatory Impact Assessment (RIA) was circulated with the August 1999 consultation letter. Further correspondence was undertaken with key number plate manufacturers. This assessment takes account of the comments made so that it now reflects more accurately the main costs associated with the new regulations.

5. As a result of consultation, the regulations have been amended to provide for:

- the introduction of a narrower character font for all new number plates (except on vehicles permitted to use the smaller motorcycle size) to avoid any unacceptable loss of readability;
- banning the use of 3-line number plates for all new and replacement plates;
- recognition of EC standards for the manufacture of number plates equivalent to the British Standard requirements;
- inclusion of references to relevant EC vehicle type-approval directives to avoid potential conflict with these;
- the introduction of a new registration format; and
- a compliance date of 1 September 2001.

6. As a result of the changes to the regulations, the estimated total costs to UK business are put at some Â£15 million for first year costs and Â£11.5 million for on-going annual costs. Compared to the draft RIA, the higher figures arise from the additional costs associated with the introduction of a new font size and the new registration format.

Purpose and Intended Effects of the Measure

7. For some time now it has been recognised that the existing number plate regulations on the display of vehicle registration marks are deficient as they do not specify a mandatory character font. New technology has made it easier to produce plates with different font styles such as italics and brushstrokes and to introduce new graphics on to plates. However, such plates can be more difficult to read, particularly by enforcement cameras. The development of automatic number plate readers also makes it important for number plates to be clearly legible. The regulations therefore specify a new type of font to be used on all new number plates from 1 September 2001. The current registration format will expire on 31 August 2001 and the new regulations are also needed to allow introduction of a new format from 1 September 2001.

8. The Road Vehicles (Registration and Licensing) Regulations 1971 required consolidation and updating to take account of various amendments made over the last 25 years. The British Standard specified in these regulations is over 25 years old and a new version (BS AU 145d) was published in January 1998. This standard has been incorporated in the new regulations to improve the specification for number plate materials and construction.

9. The new regulations permit the optional display of the Euro-symbol adjacent to the registration mark on the left-hand side of number plates. The symbol is a circle of 12 stars on a blue background showing the Member State's national identification letters below. For this purpose, the UK's national identification letters are "GB". Although not part of the new regulations, the opportunity was also taken to consider adopting the letters "UK" in place of "GB" for UK registered vehicles used abroad. The consultation indicated limited support for changing to "UK". As "GB" is well known as our national identifier, both here and abroad, it was decided on balance to retain the existing "GB" letters. Vehicles with plates incorporating the Euro-symbol will not require a separate "GB" sticker when driven within the EU. As a consequence of allowing the optional display of the Euro-symbol, a minor amendment has been made to the lighting regulations to allow the use of retro-reflective blue material on such plates. This is provided for in the Road Vehicles Lighting (Amendment) Regulations 2001.

Risk Assessment

10. Use of different fonts and styles of number plates may cause vehicle identification problems for law enforcement agencies and the general public, e.g. in 'hit and run' accidents where the vehicle is seen by a member of the public. The revised British Standard for number plates will provide vehicle keepers with a better product but they cannot benefit from this until it is specified in regulations. New regulations are also needed to provide for a new registration format as the current system will expire shortly. The existing regulations would also benefit from consolidation and clarification to correct minor anomalies.

11. The current regulations do not provide for the use of the Euro-symbol on number plates, but some vehicle keepers, especially those visiting other EU countries, may wish to use this as an alternative to the traditional oval "GB" plate or sticker. However, to accommodate the symbol, unless the registration mark contains less than 7 characters or at least one "1", the size of the characters need to be reduced or plate size increased. For the former, any significant change in character size could reduce the readability of number plates. For the latter, many cars may not be able to easily accommodate larger number plates. It was decided to resolve these difficulties by introducing a slightly narrower font size for all new non-motorcycle (or specialist vehicles permitted to use the motorcycle size character) number plates. The

existing character height and stroke width will be kept, but the overall character width reduced from 57mm to 50mm.

Options

12. Two options were identified:

- **Option 1** - continue to rely on the present requirements.
- **Option 2** - introduce new provisions, allowing a number of issues to be dealt with in one set of consolidated regulations.

Issues of Equity or Fairness

13. When preparing the draft regulations, it was necessary to consider if new number plate regulations were needed and if it was appropriate to expect vehicle keepers, number plate manufacturers and suppliers to comply with a new font style and size. Consideration was also given to police concerns about enforcement and to road safety issues if vehicles cannot be traced from the number plate. The optional use of number plates displaying the Euro-symbol was also considered in the light of demand for a new product and the need to maintain easy identification of vehicles. The implications of introducing a new registration format were also addressed.

Benefits

14. The new regulations will ensure that the legibility of number plates is not compromised, they will reduce the scope for abuse and support better enforcement. The new size font allows the optional use of the Euro-symbol on "standard" size number plates.

15. The quality and build of number plates will be enhanced by compliance with the new British Standard. In particular, plates will be more durable and the efficiency of the retro-reflective background will be enhanced and longer lasting. Plates will be stronger and more resistant to cracking, splintering or breaking under most speed impacts. Greater resistance to ultra-violet light penetration and weathering means that the characters and background colours will be less likely to fade or discolour. Enhanced testing requirements will also ensure, for the first time, better quality control for a more diverse range of permitted materials.

16. The new standard will also mean that manufacturers and, where different, suppliers of plates will be required to print their details on the plates in prescribed locations. This "dealer" marking was introduced as a result of a proposal made by the number plate industry as a means of tracing the supplying outlet. This information can be useful to the police in the detection of serious crime, e.g. the police can establish where a plate originated, providing a starting point for inquiries. This requirement in any case regularises an already widespread practice by number plate manufacturers and motor dealers and can help to identify within the trade the origins of the vehicle or plate.

17. Introduction of a new registration format is necessary to provide sufficient combinations of new registration numbers to last for a substantial period. The format will include a two letter code to signify the area of first registration, a two number age identifier - to change every six months, as at present - and

three random letters (e.g. DE51 ABC) to assist the recall and recognition of vehicle registration marks.

18. People who will benefit are vehicle keepers as well as the general public, police and law enforcement agencies, number plate manufacturers and suppliers. The consumer will gain by having a stronger and more reliable product, made to a higher standard, e.g. longer lasting, less liable to deteriorate and more resistant to breaking. Enforcement agencies will derive benefits through maintaining readability, especially by electronic means. The number plate industry face increased costs but will benefit through regularising the current practice of showing supplier details, a legal basis would be provided for the Euro-symbol and the scope for sub-standard products and related unfair competition by "cowboy" operators will be reduced.

19. These benefits are difficult to quantify but some financial gains may arise from greater ease of enforcement and prosecution.

Compliance Costs Estimates

Business Sectors Affected

20. Some 6 - 7 million number plates are supplied each year and about 2 million of these are fitted to new vehicles. Manufacturers and suppliers of number plates - who also supply kits to retailers - plus the retailers themselves - are directly affected by the proposals. Manufacturers will need to make modifications to their equipment to allow them to produce the new font and to introduce the new format. Prior to marking their number plates with the official BSI identification mark, manufacturers will also need to satisfy themselves that the product complies with the requirements of the new BSI standard by submitting samples to a test house. Quality control systems should already be in place to ensure on-going compliance with the current standard but some additional costs are expected. The new standard will require "dealer" marking by the manufacturer, or, if different, the supplier on a designated area of the plate. Most plates sold are already marked in this way as a form of advertising. The cost of the changes will depend on the method of production and the way in which retail outlets, such as garages, car accessory shops and motor dealers, are supplied.

21. This measure would not affect charities and voluntary organisations.

Compliance Costs for a "Typical" Business

Manufacturers

22. It is difficult to identify a "typical" business because number plate manufacturers vary greatly in overall size, production processes, product range and types of kits supplied to retailers. Eight manufacturers control about 99% of the market with one manufacturer supplying about 50% of the market. Two other companies supply some 20% and 15% respectively. A number of other manufacturers supply the rest. To prepare this assessment, detailed information on costs was sought from 3 companies with a large, medium and smaller market share.

23. The cost of materials to meet the new BSI standard are expected to be of the order of 10p per plate. Manufacturers will also need to re-tool to produce the new font. Some manufacturers are willing to absorb this cost and do not anticipate that this non-recurrent cost would be passed on to retailers. However, one manufacturer expressed concern about significant extra costs in supplying existing kit production customers with new number plate assembly boards for producing plates with the proposed smaller font to accommodate the Euro-symbol. There will also be additional costs arising from the introduction of the new format. This will increase administration costs and require computer system changes for some manufacturers.

Retailers

24. Number plate retailers buy plates already made-up from a manufacturer or produce plates to order, using assembly boards and materials supplied in kit form by the manufacturer. Over half of the number plates in this country are produced from kits. Additional costs to retailers will arise from the introduction of mandatory "dealer" marking when changes are needed to existing markings e.g. including the post-code of the supplying outlet. We understand that these costs will vary from a one-off charge of about Â£35 for the original artwork, to a one-off charge of Â£12 plus 10p per plate, depending on the manufacturer.

Total Compliance Costs

25. Estimated First Year Cost: Â£13.7 million for manufacturers
Â£ 1.2 million for retailers

Total: Â£14.9 million

26. Estimated Ongoing Annual Cost: Â£10.3 million for manufacturers
Â£ 1.2 million for retailers

Total: Â£11.5 million

Other costs

27. There will be consequential one-off costs to DVLA of just under Â£2 million for creating a new system for the issuing of registration marks in the new format. This includes publicity costs of some Â£200,000.

28. The Association of Chief Police Officers has confirmed that they believe the new regulations will aid enforcement and overall have not identified any adverse impacts on police costs. The introduction of the new format may require software changes to automatic number plate reading equipment.

29. Motorists and others buying new vehicles or replacement number plates will be subject to slightly higher prices reflecting manufacturers' and retailers' additional costs. One estimate suggests that the cost to consumers will be of the order of Â£1 per plate. No additional costs to charities, voluntary organisations, central or local government are expected.

Results of Consultations

30. A list of names of the organisations who responded is at Annex 2. The introduction of the regulations is broadly supported by the number plate industry, including the major manufacturers.

Two consultation letters were issued in August 1999 and January 2000, to various organisations representing the number plate industry, motor traders, police and enforcement agencies, courts, and other bodies with an interest in the proposals. A full list of consultees is attached at Annex 1. About 100 responses were received to the first consultation and some 60 replies to the second consultation letter. A list of names of the organisations who responded is at Annex 2. The introduction of the regulations is broadly supported by the number plate industry, including the major manufacturers.

A summary of the replies is available from the contact point identified at the end of this document. The compliance cost estimates reflects the industry's comments.

Summary

	Option 1 Expected Costs (Â£)	Option 2 Expected Costs (Â£)	Option 1 Expected Benefits	Option 2 Expected Benefits
Business				
Manufacturers:	Nil	<i>On-going costs:</i> Â£10.3 million (per year)	None	Curtailment of cowboy operators & associated unfair trading.
		<i>1st year costs:</i> Â£13.7 million		Better quality product assured.
Retailers:	Nil	<i>On-going costs:</i> Â£1.2 million (per year)	None	Curtailment of cowboy operators & associated unfair trading.
		<i>1st year costs:</i> Â£1.2 million		Better quality product assured.

Charities etc:	Nil	Nil / insignificant	None	Nil / insignificant.
Consumers:	Nil	Nil-Â£1 per plate	None	Better quality product assured. Euro-plate option gives greater consumer choice. Allows sticker to be dispensed with for EU journeys. New format provides for the continued registration of new vehicles.
Government:	Nil	Nil / insignificant	None	Requirements cover both Great Britain & Northern Ireland.
DVLA	Nil	Â£2 million (one-off cost)		New format necessary to continue to provide for the registration of new vehicles.
Police	Nil	None identified / minimal		Better / easier enforcement.

Monitoring & Review

31. As with the current number plate requirements, the new regulations will be enforced by the police as part of their normal traffic policing duties. No additional costs to the police are expected as a result. A supplier who sells a number plate for a vehicle to be used or kept on the public highway which fails to comply with the specified British Standard may be liable to prosecution through local trading standards

officers.

32. The proposals have been formulated in consultation with the industry and it is not intended to formally monitor or review the impact of the new regulations on businesses. The Department will however continue to liaise with the industry and the police on the working of the regulations.

Declaration

I have read the Regulatory Impact Assessment and I am satisfied that the benefits justify the costs.

Lord Whitty
Parliamentary Under Sections of State

Date: 26 February 2001

Contact point

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Annex 1: Proposed New Number Plate Regulations List of Organisations Consulted

1. Business

1A. Trade Associations

(i) General Business Interests

Association of Small Firms & Self Employed People
Association of British Chambers of Commerce
Association of Independent Businesses
CBI
CBI N. Ireland

CBI Scotland
CBI Wales
Institute of Directors
Federation of Small Businesses
Forum of Private Business
National Chamber of Commerce & Industry
National Federation of Self Employed & Small Businesses
N. Ireland Chamber of Commerce & Industry
N. Ireland Public Service Alliance
N. Ireland Small Business Institute

(ii) Trade / Employers Associations

Agricultural Engineers Association
Association of Car Fleet Operators
Association of Vehicle Recovery Operators
British Number Plate Manufacturers Association
British Parking Association
British Retail Consortium
British Road Federation
British Vehicle Rental and Leasing Association
British Vehicle Salvage Federation
Business Environment Association
Cherished Numbers Dealers Association
Coach Operators Federation
Confederation of Passenger Transport
Environmental Transport Association
Federation of Public Passenger Transport Employers
Freight Transport Association
Garage Equipment Association
Institute of Registration Agents & Dealers
Institute of Road Transport Engineers
International Powered Access Federation
National Farmers Union
National Owner Drivers Association UK
National Trailer & Towing Association Ltd
N. Ireland Chamber of Trade
N. Ireland Trade Associations Ltd
Road Haulage Association
Road Transport Association
Road Transport Association (N. Ireland)
The Transport Association
Union of Independent Companies

1B. Employees Representative Bodies

Amalgamated Transport & General Workers Union
Association of National MOT Testers
General and Municipal Workers Union
Irish Transport and General Workers Union
National Union of Road Transport Operatives
National Union of General & Municipal Workers
N. Ireland Chamber of Trade
N. Ireland Committee of the Congress of Trade Unions
Trades Union Congress
Transport & General Workers Union
Unison
United Road Transport Union

1C. Insurance Industry

Motor Insurers Bureau
Motor Conference of

Association of British Insurers
Lloyds Motor Underwriters Syndicate

1D. Motor & Number plate Trade

Avis Fleet Services
British Car Auctions
Cowie Group Plc
First European Number Plates (UK) Limited
Glass's Information Services Ltd
Halfords Ltd
High Profile
Hills (Patents) Ltd
Independent Mileage Verification Association Ltd
Independent Motor Traders Association
Jepson & Co Ltd
Lex Service Plc
3-M Traffic Products
Metrocab
Motor Cycle Industry Association
Motor Vehicle Repairers Association
N. Ireland Private Coach Operators Association
PMA-Sandalloy Ltd
Retail Motor Industry Federation
Scottish Motor Trade Association Ltd
Signs & Labels Ltd
Society of Motor Manufacturers and Traders Ltd

2. Specialist

2A. Road Safety

Accident Officers Association
Association of Industrial Road Safety Officers
Association of London Borough Road Safety Officers
British Institute of Traffic Education Research
British Safety Council
Institute of Road Safety Officers
Parliamentary Advisory Council on Transport Safety
Road Operators Safety Council
Road Safety Council of Wales
Royal Society for the Prevention of Accidents
Safety Training Advisory Council

2B. User /Transport Interests

Association of Industrial Road Survey Officers
Association of Road Transport Lawyers
British Motorcyclists Federation
The Caravan Club
Camping & Caravan Club
Chartered Institute of Transport
Computer Recognition Systems Ltd
Consumers' Association
Disabled Persons Transport Advisory Committee
General Consumer Council for N. Ireland
Institute of Transport Administration
Institute of Trading Standards Administration
Institute of Highways and Transportation
Institute of Motorcycling
Motorcycle Industry Association Ltd
National Caravan Council Ltd
N.I. Association of Citizens Advice Bureau
Pedestrians Association
Racal Messenger Ltd
Serco Technology Ltd
Transport Research Laboratory

2C. Motoring Organisations

Automobile Association
Disabled Drivers' Association
Disabled Drivers' Motor Club
Disabled Motorists Club
Institute of Advanced Motorists

Mobility Information Service
N. Ireland Motorcyclists Federation
Owner Drivers Association
Royal Automobile Association
Royal Automobile Club Foundation
Royal Scottish Automobile Club
Ulster Automobile Association

2D. Others

Applebys Coach & Tour Operators
British Standards Institution
Data Protection Registrar
David Parry Associates
European Secure Vehicle Alliance
Europlate - European Registration Plate Association
Equifax Plc
Experian
Finance & Leasing Association
GJW Government Relations Ltd
John Evans Plastics Consultancy
Keep Death Off Our Roads (K-Door)
Lea-Francis Cars Ltd
Liverpool John Moore's University
Manchester Metropolitan University
N. Ireland Transport Holding Company
Norwich Near Infrared Consultancy
Parking Committee For London
Registration Numbers Club
Road Car Ltd
Royal Mail
Sterling Services
Translink-Citybus, Northern Ireland Railways, Ulsterbus

2E. Press /Media

Autocar
Auto Express
Bbc Top Gear
Car Magazine
Commercial Motor Magazine
Motor Transport Magazine
Truck & Driver
Western Mail
What Car Magazine

3. Government /Public Authorities

3A. Central Government

Cabinet Office (Better Regulation Unit)
Department for Culture, Media & Sport
Department for Education & Employment
Department of Agriculture & Rural Development (N.I.)
Department of Enterprise, Trade & Investment - Trading
Standards Service (N.I.)
Department of Trade and Industry, Vehicles Division
DOE
Foreign & Commonwealth Office
Home Office - Police Division
Home Office - Crime Targets Task Force
House of Commons Library
House of Lords Library
Lord Chancellor's Department
Ministry of Defence
Northern Ireland Office
Scottish Executive
Uk Permanent Representative, Brussels
Welsh Assembly

3B. Agencies

Court Service
Crown Prosecution Service
Driver & Vehicle Licensing Agency
Driver & Vehicle Licensing, N. Ireland
Driver & Vehicle Testing Agency - N. Ireland
Driving Standards Agency
Environment & Heritage Service - N. Ireland
Fire Authority For N. Ireland
Health & Safety Agency for N. Ireland
Health And Safety Commission
Health And Safety Executive
N.Ireland Courts Service
Office Of Fair Trading
Roads Service - N. Ireland
Traffic Commissioners
Transport Licensing & Enforcement Branch - N. Ireland
Vehicle Certification Agency
Vehicle Inspectorate
Water Service - N.Ireland

3C. Police

Association of Chief Police Officers (ACPO)
ACPO Scotland
Northern Joint Police Board
Police Authority for N. Ireland
Police Federation - N. Ireland
Police Information Technology Organisation
Royal Ulster Constabulary
The Commissioner Of The Metropolitan Police
The Police Federation
The Police Superintendents' Association

3D. Courts

Justices Clerks Society - England & Wales
Justice Clerks Society - Standing Conference Of Fixed Penalty Clerks
Magistrates' Association
N. Ireland Resident Magistrates' Association
Transport Lawyers Policy Group

3E. Local Authority

Association of County Councils
Association of District Councils
Association of Local Authorities N. Ireland
Association Metropolitan Authorities
Association of London Government
Committee of Welsh District Councils
Convention of Scottish Local Authorities
County Road Safety Officers' Association
Local Government Association
London Boroughs Association
National Association Of Local Councils
N. Ireland District/Borough Councils
N. Ireland Society of Local Authority Chief Executives
Welsh Office of the Association of District Councils
Welsh Counties Committee

3F. Others

Government Of Gibraltar
Isle Of Man
States Of Guernsey
States Of Jersey

Annex 2: Proposed New Number Plate Regulations List of Organisations Which Responded

Amtac Laboratories Ltd
Agricultural Engineers Association
Association of British Insurers
Association of Chief Police Officers (ACPO)
ACPO Scotland
Association of Industrial Road Safety Officers
Association of Local Authorities Of Northern Ireland
Association of London Government
Automobile Association
Ballymena Borough Council
Banbridge District Council
Belfast City Council
British Number Plate Manufacturers Association
British Parking Association
British Retail Consortium
Camping & Caravanning Club
Cbi
Cbi Scotland
Cherished Numbers Dealers Association
Coleraine Bc
Confederation Of Passenger Transport
Department For Culture, Media & Sport
DOE
Derry City Council
Down District Council
East Ayrshire Council
Equifax Plc
Europlate - European Registration Plate Association
European Commission
Experian
Federation Of British Historic Vehicle Clubs
Foreign & Commonwealth Office
Freight Transport Association
German Federal Republic
Health & Safety Executive
Hills Hi-Speed Plates Ltd
Institute Of Directors
Institute Of Registration Agents & Dealers
Institute Of Road Safety Officers
Institute Of Road Transport Engineers
Jepson & Co Ltd
John Evans Plastics Consultancy
Justices Clerks Society - England & Wales

Justice Clerks Society - Standing Conference Of Fixed
Penalty Clerks
Kingston Royal Borough Council
Lea-Francis Cars Ltd
Lisburn Borough Council
Liverpool John Moore's University
Local Government Association
Lord Chancellor's Department
Magistrates' Association
Manchester Metropolitan University
Mazda Cars (Uk) Ltd
Ministry of Defence
Mobility Information Service
Motor Insurers Bureau
National Caravan Council Ltd
National Farmers Union
Newtownabbey Borough Council
Orkney Islands Council
Police Federation Of England & Wales
Racal Messenger Ltd
Rac Foundation
Registration Numbers Club
Road Haulage Association
Roads Service Hq Northern Ireland
Royal Society For The Prevention Of Accidents
Signs & Labels Ltd
Society Of Motor Manufacturers & Traders
South Ayrshire Council
States Of Jersey
Strabane District Council
The Caravan Club
3-M Traffic Products
Translink - Citybus, Northern Ireland Railways, Ulsterbus
Transport Research Laboratory
Union Of Independent Companies