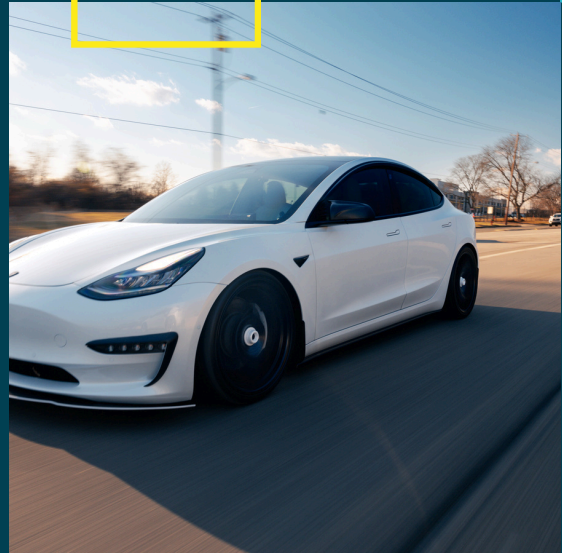




**INSTITUTE OF THE  
MOTOR INDUSTRY**



# The IMI's Response to the Introduction of eVED Consultation

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March 2026

The professional body for people working and learning in automotive since 1920

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## Do you have any views on the government's proposal for the design and scope of eVED?

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The Institute of the Motor Industry (IMI) supports the introduction of electric vehicle excise duty (eVED) as part of the long-term move towards a more sustainable motoring tax system. A mileage-linked model could create a clearer link between how much a vehicle is used and the tax paid than a flat-rate charge.

However, The design and scope of eVED must reflect how modern vehicles, including electric vehicles, record mileage and resolve discrepancies. The in-vehicle odometer display is the main record that drivers see. However, electronic systems within the vehicle may also store mileage data. This data can become relevant when investigating faults, repairs, software updates, or suspected tampering.<sup>1</sup>

Storage and access methods vary between vehicle platforms, manufacturers, and software systems. This variation creates challenges for consistency and auditing when mileage determines tax liability. The risk increases when an odometer reading is missing, disputed, or appears inconsistent.

Workforce capacity is also a key factor. The IMI's EV TechSafe Technician Forecast shows that the number of EV-qualified technicians will continue to rise, reaching around 137,000 by 2032 and 193,000 by 2035. However, demand is expected to grow faster. A shortfall is projected from 2033 onwards, exceeding 44,000 technicians by 2035.<sup>2</sup>

Most mileage checks will rely on the in-vehicle odometer display. However, if the odometer is inoperative, disputed, or shows signs of tampering or repair issues, the correct mileage may need professional diagnostic checks.

If diagnostic checks are required, policymakers must make sure there is enough competent capacity. They must also set safe and consistent processes. Recognised competence standards, such as TechSafe, can support delivery at scale.

This assessment reflects feedback from IMI members. Over the past 12 months, members have raised concerns about whether the sector is ready for mileage-based EV taxation. They believe policy design does not reflect the pace of technological change, the availability of skills, or the practical realities of delivering this work in workshops. Several note that increasing system complexity, combined with workforce constraints, risks discouraging engagement with EV work rather than supporting transition.<sup>3</sup>

The IMI therefore supports a proportionate, phased approach to eVED. Early implementation should focus on clarity, consistency and operational realism, rather than adding technical complexity that could increase the risk of error or place further pressure on vehicle testing stations.

### Footnotes

1. EV Mileage Verification and Diagnostic Access - Evidence note, section "How EV mileage is accessed".

2. EV TechSafe Technician Forecast - Q3 2025, IMI, 2026.

3. Member Evidence Research Themes, IMI qualitative thematic analysis of coded member survey submissions relating to eVED, 2026.

## What should the government consider when developing guidance that supports motorists to estimate mileage?

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Guidance must be clear, consistent and written in plain language. EV mileage data may be stored across multiple vehicle systems and accessed through different routes. Verification may need diagnostic access and cross-checking across systems.<sup>1</sup>

### Guidance should:

- Specify which mileage figure applies for eVED
- Explain, at a high level, why discrepancies can occur
- Set expectations around estimation accuracy and correction

Where discrepancies arise, technicians may struggle to interpret or resolve them without technical verification. Guidance for motorists should therefore reflect the limits of self-assessment and clearly explain when professional verification may be needed. Member feedback supports this assessment. Members highlight the practical challenges created by growing technical complexity and frequent software updates in workshop settings.<sup>2</sup>

Guidance should also support non-digital routes, recognising that not all motorists use manufacturer apps or online tools.

## How could technology make eVED easier and simpler for businesses and motorists to comply with?

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Technology can support compliance where it reduces manual reporting and removes ambiguity. Evidence highlights potential benefits from automated mileage capture at defined lifecycle points and from standardised reporting interfaces.<sup>3</sup>

### The IMI sees potential in:

- Automated mileage capture at defined lifecycle points
- Standardised digital interfaces for mileage reporting
- Integration with existing MOT and vehicle records

However, there is also variation in how EV platforms store and offer access to mileage data.<sup>1</sup> Without common standards, purely digital solutions risk adding complexity rather than simplifying compliance.

Any technological approach should therefore complement existing systems and professional checks, not replace them. Where mileage validation needs diagnostic access, policymakers must make sure this aligns with technician competence, equipment availability and safe working conditions.

### Footnotes

1. EV Mileage Verification and Diagnostic Access - Evidence note, sections "How EVs record mileage" and "How EV mileage is accessed".

2. Member Evidence Research Themes, IMI qualitative thematic analysis of coded member survey submissions relating to eVED, 2026.

3. EV Mileage Verification and Diagnostic Access - Evidence note, sections "How EVs record mileage" and "How EV mileage is accessed".

## Would you support the consideration of technological solutions on an opt-in basis, in future?

The IMI supports technological solutions on an opt-in basis.

An opt-in approach allows innovation to be tested without excluding motorists or businesses that cannot adopt new systems. Given the variation in EV mileage storage and access, introducing mandatory digital solutions at an early stage could increase complexity and implementation risk.<sup>1</sup>

### An opt-in approach allows the government to:

- Pilot solutions at manageable scale
- Gather evidence on accuracy and behaviour
- Refine design before wider adoption

This approach can reduce implementation risk while encouraging innovation.

## What should the government consider when designing the managing under and over payments of eVED?

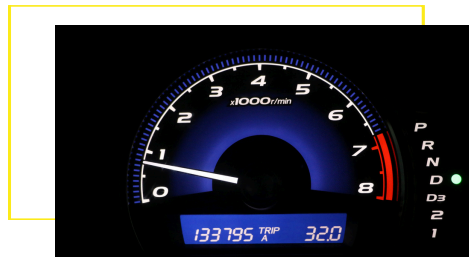
The IMI recommends a system that clearly distinguishes between genuine error and deliberate avoidance. Mileage estimation can introduce uncertainty where multiple mileage figures exist.<sup>2</sup>

Evidence shows that discrepancies may result from system variation and that intent cannot always be determined without technical verification.<sup>3</sup>

### The system should therefore include:

- Clear correction windows
- Simple reconciliation processes
- Proportionate treatment of low-impact discrepancies

Overly complex reconciliation mechanisms risk increasing inconsistency rather than supporting compliance.



### Footnotes

1. Mileage verification and diagnostic access: ICE vs EV - Evidence note, section “Who can access mileage data, and EV mileage access pathway”.
2. Mileage fraud data - Evidence note, section “What changes with EVs”.
3. Mileage fraud data - Evidence note, sections “Known fraud methods” and “Why EV mileage verification requires system access”.

## Are there other steps the government should take to support MOT garages to prepare for eVED?

Beyond engagement on fees and mileage check costs, the government should support vehicle testing stations with clear technical guidance and realistic lead-in times.

EV technical competence is increasing but is not universal across vehicle testing stations, and capability varies by location and business type. Routine mileage checks will rely on reading the in vehicle display, however suspected tampering, or post-repair anomalies may require diagnostic verification. When this is required, stations will need additional training and appropriate equipment aligned with recognised EV competence standards, such as TechSafe.

Supporting vehicle testing stations to prepare for eVED should focus on three areas.

### 1. Clear guidance

Give clear guidance on when the odometer reading is enough and when stations must use diagnostic checks. The guidance should also explain what evidence stations must record.

### 2. Training and assurance

Align training and assurance with EV safety and competence standards, such as TechSafe, for stations that carry out diagnostic checks.

### 3. Realistic lead-in times

Allow realistic lead-in times. Where needed, give support for equipment and training so stations can deliver the service consistently across locations and business types.

Member feedback reinforces this position. Members report pressure from growing technical complexity, rising training costs and time constraints. Several express concern that additional eVED responsibilities, without corresponding support, would further constrain capacity and increase delivery pressure.<sup>1</sup>



#### Footnotes

1. Member Evidence Research Themes, IMI qualitative thematic analysis of coded member survey submissions relating to eVED, 2026.

## Do you agree that MOT garages are well placed to be accredited offers of mileage checks?

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Yes, with conditions.

Vehicle testing stations operate within the MOT framework, which includes formal mileage recording and correction processes and offers an established compliance route for motorists.<sup>1</sup>

This positions them well to carry out mileage checks where access is straightforward.

However, Mileage is usually taken from the in-vehicle odometer display. However, the displayed reading may sometimes be missing, disputed, or inconsistent. This may happen if there are signs of tampering, module replacement, or repair issues.

In these cases, technicians may need to confirm the mileage using diagnostic checks and cross-checks. Where diagnostic checks are required, accreditation should reflect proven EV competence and safe systems of work, such as TechSafe. Policymakers should not assume that all vehicle testing stations have the same capability.

A targeted accreditation approach would support safety and consistency, while avoiding unnecessary burden where a straightforward odometer display reading is sufficient.

IMI member feedback reinforces the importance of competence-based accreditation. Members express concern that assuming uniform capability could increase safety risks and undermine confidence in mileage checks.<sup>3</sup>

## Are there alternative approaches for checking mileage in the first three years after a car is registered?

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The IMI supports exploring alternatives for pre-MOT vehicles, including validated manufacturer data and structured digital declarations.

Potential alternatives include:

- Manufacturer-supplied validated mileage records
- Scheduled digital declarations supported by audit

However, mileage storage and access vary across EV platforms.<sup>4</sup> Any alternative approach must therefore meet appropriate standards of accuracy and auditability.

### Footnotes

1. Mileage fraud data - Evidence note, references to DVSA / GOV.UK mileage correction processes (baseline section).

2. Mileage fraud data - Evidence note, sections "What changes with EVs" and "Why EV mileage verification requires system access,".

3. Member Evidence Research Themes, thematic analysis of member submissions, IMI, 2026.

4. Mileage fraud data - Evidence note, sections "What changes with EVs" and "Why EV mileage verification requires system access," pp 4-5.

## What impact will the proposed approach for eVED collection have on fleets and leasing businesses?

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Fleets and leasing businesses already collect mileage data. However, variation in how EV platforms record and give access to that data may need additional reconciliation and reporting where alignment is unclear.<sup>1</sup>



## What should the government consider to minimise administrative burdens for these businesses?

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The government should prioritise:

1. Alignment with existing mileage recording practices
2. Clear definitions and reporting points
3. Predictable reconciliation cycles

Evidence shows that system complexity can lead to inconsistency and create compliance challenges.<sup>2</sup>

## What should the government consider to ensure the overall approach is fair?

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Fairness depends on clarity, proportionality and equal access to compliance routes. Mileage discrepancies may arise from system variation, and intent is not always clear without technical verification.<sup>3</sup> The system must not penalise motorists or businesses for technical complexity beyond their control.

### Footnotes

1. Mileage fraud data - Evidence note, sections "Known fraud methods" and "Why EV mileage verification requires system access".

2. Mileage fraud data - Evidence note, sections "Known fraud methods" and "Why EV mileage verification requires system access".

3. Mileage fraud data - Evidence note, sections "Known fraud methods" and "Why EV mileage verification requires system access".

## Which life events should be considered when building flexibility into eVED?

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The system should account for:

- Vehicle sale or transfer
- Extended vehicle inactivity
- Business closure

Clear and proportionate handling of these events will support accurate mileage reporting during changes in circumstances.

## Do you agree with the proposed approach for car lifecycle events?

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Broadly yes, if lifecycle events trigger clear mileage capture points and defined handover rules, supported by robust data capture and audit processes.

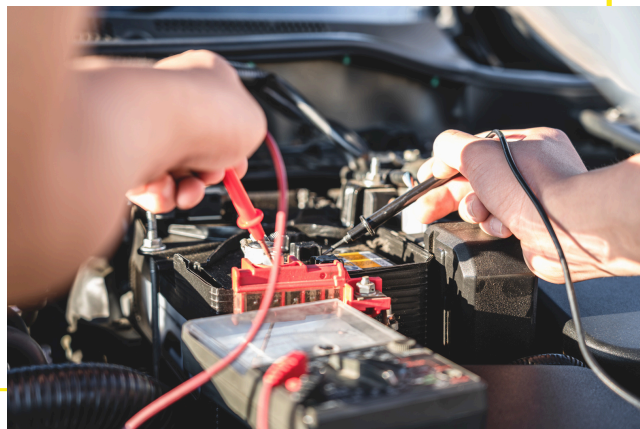
## Is there anything further to consider for car lifecycle events?

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The government should make sure there is:

- Clear responsibility at handover
- Consistent data capture timing
- Accessible correction routes

These steps will support accurate and auditable mileage records.



## What should the government consider when developing an overall compliance approach?

Mileage discrepancies can arise from user error, odometer faults (including inoperative displays), legitimate repairs, or deliberate tampering. In some cases, technicians cannot determine intent without technical checks.

Compliance approaches should therefore focus on prevention. This includes clear guidance, prompts that help users record mileage correctly, and simple ways to correct errors. Where anomalies appear, authorities should use targeted verification before moving to enforcement.

The compliance approach should prioritise:

- Error prevention
- Guidance before enforcement
- Proportionate checks

IMI workforce projections show that although EV competence is increasing, demand is expected to exceed supply from the early 2030s.<sup>2</sup> Compliance models that assume universal diagnostic capability may increase inconsistency rather than preventing avoidance.



Compliance models should rely on the odometer display for routine mileage checks. However, they should include a clear escalation route when anomalies appear.

When an anomaly arises, testing stations should refer the case to a competent and accredited provider for diagnostic checks. Technicians who carry out these checks should demonstrate EV competence, for example through recognised schemes such as TechSafe.

Member feedback reinforces this position. Members stress rapidly changing vehicle software, limited access to OEM data and inconsistent diagnostic pathways as significant compliance risks.<sup>3</sup>

### Footnotes

1. Mileage fraud data - Evidence note, sections "Known fraud methods" and "Why EV mileage verification requires system access".
2. EV TechSafe Technician Forecast - Q3 2025, IMI, 2026.
3. Member Evidence Research Themes, IMI qualitative thematic analysis of coded member survey submissions relating to eVED, 2026.

## What should the government consider when designing the penalties regime?

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Penalties must clearly distinguish between genuine error and deliberate misconduct. Early implementation will likely include user mistakes and genuine odometer faults.<sup>1</sup>

Penalties must also reflect delivery capacity. IMI projections show a widening gap between EV-qualified technician supply and demand from 2033 onwards, reaching a shortfall of more than 44,000 technicians by 2035.<sup>2</sup>

If there are signs of tampering or disputed readings, penalties should rely on professional verification. An accredited provider should carry out the verification and record the results in an auditable report.

Competent technicians must perform this work. They should meet recognised EV competence standards, such as TechSafe.

IMI member insight reinforces the need for proportionality. Members express concern that penalties which fail to reflect technical complexity or workforce constraints may increase dispute and challenge.<sup>3</sup>

### Footnotes

1. Mileage fraud data - Evidence note, sections "Known fraud methods" and "Why EV mileage verification requires system access".
2. EV TechSafe Technician Forecast - Q3 2025, IMI, 2026.
3. Member Evidence Research Themes, IMI qualitative thematic analysis of coded member survey submissions relating to eVED, 2026.

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