



Executive Summary: IMI Response to eVED Consultation

IMI position

The Institute of the Motor Industry (IMI) supports the principle of reforming motoring taxation as the transition to electric vehicles accelerates. A mileage-based system has the potential to create a fairer link between road use and tax.

However, a mileage-based electric vehicle excise duty (eVED) system will only succeed if it reflects the technical complexity of modern vehicles and the realities of workforce capacity across the automotive sector.

Without this, there is a risk of:

- Inconsistent and disputed mileage data
- Increased burden on garages, fleets and motorists
- Increasing inconsistency, administrative burden and challenges in compliance

The IMI is therefore calling for a phased, practical approach that prioritises simplicity, fairness and safe delivery.

What the IMI is calling for

To ensure eVED is deliverable and effective, the IMI recommends:

Odometer-first approach: Mileage reporting should rely on the in-vehicle odometer display wherever possible

Technology introduced on an opt-in basis: Digital and automated solutions should be tested and refined before any mandatory rollout

Policy design should reflect workforce capacity and the availability of EV-qualified technicians: Diagnostic requirements must reflect the availability of EV-qualified technicians

Competence-led delivery: Any diagnostic checks should be carried out by appropriately trained and accredited technicians, aligned to recognised standards such as TechSafe

Proportionate compliance and penalties: The system must distinguish between genuine error and deliberate misconduct, with clear correction routes and fair enforcement

Why this matters

Electric vehicles are fundamentally different from traditional vehicles. Mileage is no longer a single, simple data point.

Mileage information may be:

- Stored across multiple electronic systems
- Affected by software updates, repairs or component changes
- Accessed differently depending on manufacturer and platform

This creates real challenges for consistency, auditing and dispute resolution where mileage determines tax liability.

Policy design must reflect this complexity. Assuming that mileage data is standardised, easily accessible, or always accurate risks introducing error, inconsistency and unnecessary burden.



The delivery challenge

A successful eVED system depends not just on technology, but on people.

The IMI's workforce forecasts show that while the number of EV-qualified technicians will continue to grow, with a projected shortfall emerging from the early 2030s and exceeding 44,000 technicians by 2035.

At the same time:

- Technical capability varies across regions and businesses
- Not all garages have diagnostic access or EV competence
- Increasing complexity is already placing pressure on the sector

Any system that relies heavily on diagnostic verification must be designed with these constraints in mind.

How the system should work in practice

Simple by default: For most motorists and businesses, mileage reporting should be straightforward and based on the odometer reading.

Clear escalation where needed: Where mileage is missing, inconsistent or disputed, there should be a clear and accessible route to professional verification.

Targeted use of diagnostics: Diagnostic checks should only be required where necessary and carried out by competent, accredited providers.

Accessible guidance: Motorists and businesses should have clear, plain-language guidance explaining:

- Which mileage figure to use
- Why discrepancies can occur
- When professional verification is needed

Role of MOT garages and the wider sector

MOT garages and vehicle testing stations are well placed to support mileage checking, particularly where this involves straightforward odometer readings.

However, policymakers should not assume uniform capability across all businesses.

Where diagnostic checks are required:

- Technicians must have appropriate EV competence
- Accreditation should reflect safe systems of work
- Sufficient lead-in time, training and equipment will be essential

Aligning delivery with recognised frameworks such as TechSafe will be critical to ensuring consistency, safety and public confidence.



Implications for fleets and motorists

Fleets and leasing companies already collect mileage data, but variation between vehicle platforms may create additional complexity.

To minimise administrative burden, the system should:

- Align with existing reporting practices
- Provide clear reporting points
- Enable predictable reconciliation processes

For motorists, the system must remain simple, transparent and fair — particularly where technical factors outside their control affect mileage accuracy.

A fair and proportionate system

Mileage discrepancies can arise for many legitimate reasons, including:

- User error
- Software updates
- Repairs or component replacement
- Odometer faults

In many cases, intent cannot be determined without technical investigation.

The IMI therefore recommends a compliance approach that prioritises:

- Error prevention and clear guidance
- Simple correction processes
- Targeted verification before enforcement
- Proportionate treatment of low-impact discrepancies

Penalty regimes must reflect both technical complexity and workforce capacity, avoiding unintended consequences that could undermine trust in the system.

IMI's role

This response is based on IMI research, workforce forecasting and direct feedback from members across the automotive sector.

As the professional body for automotive, the IMI will continue to work with government and industry to ensure that policy is practical, deliverable and supports the successful transition to electric vehicles.