

Written evidence submitted by the Petrol Retailers Association (EVP0023)

Introduction

The Petrol Retailers Association (PRA), operating under the financial umbrella of the Retail Motor Industry Federation (RMI) represents roughly 5,500 independent fuel retailers who now account for 70% of all UK forecourts. We provide a voice to Government for all these retailers, both large and small. Including 80% of Motorway Service Areas (MSA). The PRA provides support to its members through information, services, and advice to ensure that the independent fuel retailing sector can continue to grow and be competitive in an ever more challenging business environment.

The Car Wash Association (CWA) is also part of the RMI group of not-for-profit trade associations and works in close tandem with the PRA. We represent the major retail wash operators such as oil companies and independent fuel retailers as well as equipment manufacturers of car wash equipment.

Our work requires us to work closely with appropriate government departments to ensure that the sustainability of independent forecourt retailers is properly considered.

Summary of evidence

1. Consumers are concerned about the new price of EVs, the level of charging infrastructure, and the limited range of EVs.
2. The new EV market requires substantial investment in charging infrastructure to achieve the government's net zero 2030 objective.
3. It is estimated that the UK will have to spend £100 billion by 2030 to meet projections of 20-30 million EVs on the roads and the rollout of EV charging points must become five times quicker before the ICE ban comes into place.
4. Restrictions on ICE vehicles should be limited to protect economic recovery and tax revenue for the exchequer.
5. The PRA and its members have considerable experience and expertise in the sector and can help the government transition to net zero and assist in the development of national infrastructure.
6. The government needs to provide incentives for EV uptake but not at the expense of ICE vehicle owners.
7. Hydrogen charging represents a practical choice given the existing forecourt and refuelling infrastructure in the UK, with the added benefit of energy storage. It should be considered for the entire UK car parc beyond just HGVs.

8. Any road pricing scheme introduced by the government must avoid double taxation of ICE vehicle drivers or risk public backlash and must be implemented in a fair, proportionate and efficient manner.
9. A road pricing scheme must clearly separate charges according to the type of vehicle. ICE vehicles can continue to pay fuel duty which functions as a form of road pricing while EVs should pay a road user charge on a per-mile basis. Hybrids would pay both using a percentage ratio according to its energy mix.
10. A rate per-mile should vary according to the type of road travelled on, and the location and time of travel.
11. The government could implement a planning system to help drivers plan their journeys and inform them of the potential cost.
12. Public support for road pricing is higher than in 2007 under the condition that the revenue raised would be reinvested into road maintenance, public transport or climate change mitigation. The destination of government spending should be clearly communicated to the public.

Objectives of the sector

To meet the government objective of net zero by 2050 and the phase out the new sale of Internal Combustion Engine (ICE) vehicles by 2030 and hybrids by 2035, the government must take account of the position of roadside retailers and petrol forecourts. At the PRA, we are aware that the electric era is upon us and that considerable commercial opportunities will be presented. However, there are a number of practical concerns regarding the uptake of Electric Vehicles (EVs), the rollout of charging infrastructure, and a suitable scheme to replace foregone fuel duty, vehicle excise duty (VED) on ICE vehicles and 20% VAT which together produces over £40bn/year revenue to the treasury.

Accelerating the shift to Zero Emission Vehicles

1. The feasibility, opportunities, and challenges presented by the acceleration of the ban of the sale of new petrol and diesel vehicles to 2030

A ban on the sale of ICE vehicles by 2030, and hybrids by 2035, is a highly ambitious target for the government. The demand for EVs is increasing as environmental concerns grow but consumers are put off by the price of new EVs, the level of charging infrastructure, and the limited range of EVs.¹ These are the biggest challenges presented by the acceleration of the ban on new ICE vehicles and encouraging the use of EVs. The new electric market to be created requires substantial investment in charging infrastructure.

This new market does present considerable commercial opportunities for the PRA. These include but are not limited to the following:

- a. Petrol station forecourts will still be required beyond the ban on the purchase of new ICE vehicles in 2030
- b. The demand for roadside retail services is likely to increase as drivers search for places to shop and eat as they charge their vehicles
- c. Car wash services will continue to be required and provide a continuation of the services operated by our members

The government Energy White paper published on 14th December 2020 referenced a £2.8 billion package of measures to support industry and consumers to make the switch to cleaner vehicles.² As part of this package, a £950 million fund would be invested in improving grid capacity along the strategic road network to prepare for the 100% uptake of EVs and zero emission vehicles. This initial move from the government is expected to spur private sector investment in charging infrastructure across other UK networks.

It has been estimated that the UK will have to spend £100 billion by 2030 to meet projections of 20-30 million EVs on the roads.³ Furthermore, research by Policy Exchange has found the current rollout of EV charging points must become five times quicker before the 2030 ban on ICE vehicles comes into force. Installations will need to accelerate from current levels of 7,000 a year to 35,000 annually.⁴ While it is expected that approximately 50% of the charging of personal EVs will be done at home, widespread access to charging infrastructure presents a considerable obstacle for the government to overcome.

A major challenge for the government as it encourages the uptake of EVs is to consider the impact of unreasonable deterrents on ICE vehicles. Across the country, personal ICE vehicles are the primary means of transport for individuals and businesses and are vital for economic growth. Policy decisions that would target ICE vehicles would also contradict the government's levelling up agenda. The limited affordability of EVs means that less well-off areas will continue to have a high proportion of ICE vehicles. The targeting of ICE drivers would have a prohibitive impact on economic recovery felt most acutely in such areas.

There is also a disparity in the availability of public transport around the country and consequently personal vehicles are often necessary to keep the economy moving forward. Particularly as we recover from the economic downturn due to Covid-19 in 2020 and 2021, restrictions on the owners of ICE vehicles could stump recovery attempts and hit the exchequer in the form of reduced tax revenue.

Importantly, the proposed ban on new sales of ICE vehicles does not eliminate the second-hand car market and drivers are likely to continue using ICE vehicles for a considerable time after this date. The complete removal of ICE vehicles will therefore not take place until 2040 at the earliest. The 2030s therefore represent the time for the market to replace these remaining ICE vehicles with EVs and the considerable infrastructural overhaul required to remove ICE vehicles and protect the businesses and livelihoods of individuals in our sector.

Practically, there are a number of challenges for forecourts to overcome before they can consider building charging points on site.

- a. To install Ultra-Rapid charging points, they must connect to a local substation. Our members have told us that the cost to do this could be as high as £900 per meter. We have also heard quotes in the millions to do this. In some instances where the distance is 2 miles, this cost rises to £2.7 million.
 - i. Further regulatory issues can lead to this cost rising as cables are required to travel over way fares or other property.
- b. In order to cater for the additional charging points, the site layout may need to be adapted. This may lead to the removal of some parking bays which can impact the revenue at the convenience stores on site.
- c. Charging points and all associated equipment plus the vehicle being charged must be located outside the hazard zones to remove the risk of igniting hydrocarbons on site. This severely restricts the area of a typical forecourt that may be utilised for the charging of EVs and often makes it impossible for EV charging to be facilitated.
- d. Should a substation be required on a petrol filling station to provide Ultra Rapid charging, the earthing requirements are onerous and can lead to the installation not being feasible when attempting to co-locate near to fuel storage infrastructure.
 - i. The charging points must also be connected to the shop and with a cut-off switch easily accessible by staff

The PRA and its members have considerable experience and expertise in the sector and can provide substantial assistance in achieving the ambitions of government.

2. The actions required by government and private operators to encourage greater uptake of electric vehicles and the infrastructure required to support them

Incentives already exist that encourage the uptake of electric vehicles such as plug-in grants, congestion charge exemptions, and first year road tax exemption. Tax incentives work and people will change their behaviour if incentives are there. The correct approach from government should be to raise the attractiveness of buying new EVs and to abate concerns over charging infrastructure and EVs' limited range capacity. It should be made clear that a tax on ICE vehicles will not encourage the uptake of EVs and any increase in fuel duty or an additional tax would harm workers and consumers who rely on currently cheaper ICE vehicles and for whom the cost of an EV is still excessive. The average price for an EV in the UK is currently around £44,000, with the cheapest electric car costing £17,350.⁵ Even with the maximum grant available for EV cars under £50,000 of £3,000, this still amounts to at least £14,350. This represents a significant outlay for the consumer. Although running costs are closer to reaching parity, there still remains an incentive to purchase and use ICE vehicles over EVs.

The majority of the value of an EV stems from the battery, which can account for up to 40% of the vehicle's total value. Transportation of batteries from Gigafactories to vehicle manufacturers is an area where the UK is falling behind its international competitors. China, South Korea, and Japan are leading the way but both Sweden and Poland are investing in Gigafactories with substantial government investment.⁶ The UK car industry employs more than 800,000 people directly and indirectly and a failure to accelerate the production of these facilities has potentially devastating consequences and could cost over 100,000 jobs by 2040.⁷ Liam Byrne MP has warned that rapid progress needs to be made on a planned Gigafactory making batteries for EVs before ground is lost to rival projects on the continent.⁸

As mentioned before, the cost of providing charging infrastructure across the UK will require considerable resources. The transition to EVs through incentives will have the impact of reducing the tax revenue to the exchequer from fuel duty VED and VAT. To fund the investment necessary, the government must create alternative policy instruments and revenue streams. In so doing, ICE vehicles and EVs should pay different taxes to reflect their level of road usage and the source of their energy. It is crucial that the owners of ICE vehicles are not effectively subsidising fellow road users who similarly contribute to the deterioration of roads and increase congestion. Alternative policy instruments will provide greater flexibility to the government and provide improved management over the composition of the UK Car Parc.

Our members at the PRA are in a position to assist in the development of the national infrastructure that would be required to encourage greater uptake of EVs.

3. The government's ambition to phase out the sale of new diesel heavy goods vehicles, including the scope to use hydrogen as an alternative fuel

We believe that our members are well equipped to use hydrogen as an alternative fuel. Among our members, there is good experience of fuels other than petrol or diesel, for example LPG and with the correct incentives we believe that this would work more effectively than EVs on petrol forecourts. Hydrogen is dispensed as a liquid gas and facilitates a similar operation to current petrol filling stations. It can be dispensed and processed on site or acquired from a supplier. With the correct incentives, hydrogen can become an effective and carbon neutral energy source for heavy duty goods vehicles. A new road pricing scheme would not be necessary in this instance as fuel duty could still be charged.

In preparing for the transition to the electric era, our members have begun conducting research on the cost and business case of providing EV charging infrastructure. One Motorway Service Area (MSA) operator was quoted £2million to be connected to the closest substation and a 3-year waiting period. We have heard that the government is looking to the site operator to fund Ultra Rapid chargers and we understand that these can cost between £42,000 to £52,000. This is a huge outlay against uncertain revenue; therefore, our members are prepared to install charging points where it is feasible but for many, the current business case is not viable. This is particularly true among independents who own or operate one or two sites.

The argument for a greater emphasis on the use of hydrogen charging is a far more practical case for our members and for the current filling stations infrastructure provided across the UK. Hydrogen is a carbon neutral option and is more energy efficient than EVs. Hydrogen can also store energy produced from renewable sources which otherwise risks being wasted.

Hydrogen can also be stored to be accessible during peak times as there are currently no ways to store vast amounts of energy during off-peak times. Pipelines that were once used for carrying natural gas can be used for hydrogen instead and perform the dual role of storing energy as unlike electricity, the energy carried in hydrogen does not diminish as it is moved.⁹ Its feasibility therefore for storage, standby generation and for heavy goods vehicles is clear but it should also be considered as an innovative solution to many of the practical challenges presented by transitioning to a wholly EV car parc.

Road Pricing

1. The case for introducing road pricing (economic, fiscal, environmental, social impacts)

Road pricing, which was heavily rejected by the British Public in 2007 when it was considered by the then Labour government, could be viewed as a replacement for fuel duty in the UK.¹⁰ Although it has affectionately been referred to as a ‘poll tax on wheels’, public sentiment towards road pricing has evolved.¹¹ In principle, because of the alternative energy sources powering vehicles, there is a strong argument for a pay as you use scheme. It is the same principle currently in place for fuel duty. The more you drive, the more fuel you use and therefore more duty you pay. Road pricing is a continuation of the same principle.

However, there are consequences to consider of introducing road pricing alongside fuel duty effectively creating a double taxation system:

- a. A reduced incentive to drive which may stifle economic recovery as the country attempts to bounce-back from the worst economic performance in decades
 - i. Drivers who have to make journeys for business will have to pay more and are likely to resent the government’s decision
- b. Drivers are likely to make fewer non-essential journeys, which will be highly valued after the continuous lockdowns and restrictions imposed in 2020
 - i. This could also lead to further resentment of the government’s decision
- c. Consequently, the government can expect a significant reduction in the estimated £36 billion it receives in fuel duty as fewer journeys are taken
- d. The government may not receive as much revenue as expected from a road pricing scheme as fewer journeys would be made by those who would be overtaxed

Any introduction of a road pricing scheme should consider the implications for ICE vehicle owners, the individuals who rely on them, and the impact on businesses and the economy. In these times of economic uncertainty, the introduction of a disproportionate and unfair tax is likely to lead to considerable opposition.

2. Most appropriate road pricing scheme and practicalities of implementation

In developing an appropriate and measured road pricing system, we have developed a few clear and guiding principles that should underlie any new scheme:

- a. A new road pricing tax must not increase the burden of tax on drivers who rely on ICE vehicles and transportation for their jobs
- b. There should be a clear separation of charges and costs for ICE vehicles and EVs
 - i. Cost of fuel for ICE vehicles and distance travelled or mileage for EVs
 - ii. A combination of the two should be used for hybrid vehicles according to their energy mix
- c. The net effect of fuel duty is already a form of tax by mileage as further distance travelled requires greater quantities of fuel
 - i. Double taxation would disproportionately burden ICE vehicles
- d. Road pricing would remove the need for road tolls
 - i. Road tolls are an expensive and static form of tax that also leads to drivers seeking alternative routes which places added pressure on roads not intended for such capacity
 - ii. There are additional implications in terms of congestion and environmental costs due to construction of kiosks and expanded motorways
- e. Road pricing should distinguish between the type of road travelled on, the time of day, and the location
 - i. This could include different prices for Motorways, A-roads and B-roads, urban and rural areas
 - ii. The existing congestion charges would act as an additional tax to reduce the level of congestion in urban centres

These principles and guidelines have been considered important to assist the government in meeting their goal to phase out the purchase of new ICE vehicles by 2030 and increase the uptake of EVs.

With these guidelines in place, and striving for a transparent, proportionate, and ultimately fair road pricing scheme, we provide below our recommendations for a road pricing scheme that runs parallel to and complements the existing fuel duty:

- a. Maintain parallel duty regimes whereby ICE vehicles continue to pay as they drive (through fuel duty) and EVs pay a road user charge (on a per-mile basis)
 - i. Consumers of EVs would receive additional grants and incentives to increase uptake
 - ii. Hybrids would pay both at a percentage ratio according to the vehicle type and the energy mix (e.g., 60% electric – 60% road pricing charge). This would provide an incentive for an electric mix
- b. The rate per-mile would vary according to the type of road travelled on, and the location and time of travel
 - i. Motorways, A-roads, and B-roads would have different rates according to their usage, as would metropolitan and rural areas
 - ii. This would help to achieve complementary targets of reduced congestion and road maintenance
 - iii. All vehicles under this scheme would require technology to measure road usage that can accurately record this information
 - I. This suggests that a road pricing scheme would need to be introduced at a date in the future (2025) when electric and hybrid vehicles can be fitted with suitable tracking equipment, which would become mandatory in all new vehicles from 2030
 - II. Mapping technology could help drivers map out their journeys and estimate costs
- c. The type of vehicle driven should also affect the road pricing payment
 - i. This could be set according to the vehicle's weight which would provide a further incentive for battery manufacturers to develop lighter batteries whilst not discriminating against smaller ICE vehicles that drivers may use for their day-to-day work
 - ii. A separate rate could be introduced for motorbikes

The importance of this recommendation is that there would not be undue discrimination according to the type of fuel used to power vehicles. The introduction of road pricing would include a 100% discount for ICE vehicles as they already pay a significant fuel duty, a percentage-based discount for hybrid vehicles according to their energy mix, and no discount for electric vehicles who are not required to pay any fuel duty. The continuation of fuel duty alongside road pricing provides the government with a combination of policy instruments that they can manoeuvre as they seek to improve the uptake of EVs and achieve the objectives of reducing emissions and congestion.

Using the tracking equipment within the vehicles, the government could provide drivers with a statement each month informing drivers of what they owe according to how much they travel. This would provide clarity for individuals over what is being charged and for how much. The government could go to tender to encourage competition among private companies who can efficiently operate utilities once the parameters have been set to promote innovation and the smooth implementation of road pricing.

To assist individuals who are planning on travelling and making journeys on multiple roads and through different areas, a system should be introduced that will help drivers to plan their journeys and inform them of the potential cost. Therefore, individuals would be aware of the tax they will be charged ahead of their journey. This charge could also change according to the time of day with a higher rate during rush hours.

3. Level of public support for road pricing

The individuals and drivers which a road pricing tax would likely harm are members of the workforce who need their cars to carry out their day-to-day tasks and who are responsible for keeping the economy moving. While EVs are reaching their record numbers, low, ultra-low and zero-emission vehicles only account for roughly 750,000 of the 40 million vehicles on the road today. The introduction of a road pricing scheme on top of fuel duty would penalise the millions of ICE vehicle owners and hamper economic recovery. Largely, the tax would disproportionately affect poor workers who without access to their primary means of transport would be unable to work.

A road pricing scheme would also impact the Van and HGV segment. Many of the companies operating in this area tend to hold onto their vehicles for a longer time. Therefore, the imposition of a further tax on ICE vehicles could put prices of raw materials, food and other services up as companies price the higher costs into the cost of distribution.

In 2007, road pricing was largely opposed on the grounds that it was a “poll tax on wheels” and was a means of covert surveillance of the population. At this time, a survey conducted by Ipsos MORI found higher levels of opposition than support (48% opposed; 33% support).¹² Whilst the second concern has been reduced following the widespread adoption of mobile phones, the first is still a very real concern for the government and implementing bodies. Recent polling by Ipsos MORI suggests that public support for road pricing has increased since then.

The public also showed greater support for a road pricing scheme if the revenue raised was earmarked for a specific purpose. Across the UK, 62% (dropping to 60% for car owners) of people are in favour of schemes which would charge users a fee to drive around towns and cities.¹³ If all revenues from the scheme were used to tackle climate change 33% of the public would strongly support the scheme, compared to eight percentage points lower when this is not a component of the scheme. It is clear that the government should be clear on how revenue raised by road pricing will be spent, be it on public transport or climate change mitigation, and clearly communicate this to the public.¹⁴ We recommend that the revenue raised from this scheme goes directly to improving the roads and assisting forecourts in the provision of charging infrastructure.

Privacy concerns raised in 2007 are still relevant today even though support for a road pricing scheme has risen since then. In addition to providing clarity over where the revenue raised from receipts will be spent, the records collected on drivers and their travel should be discarded once payment has been received. The technology required must be precise and accurate but must not risk infringing on the civil liberties of citizens.

4. Lessons to be learned from other countries road to decarbonisation

Although there are lessons to be learned from other countries, the government must not underestimate the power of the cost of mobility in galvanising public opposition. It is a highly sensitive social issue and motivates political protest. In France for example, ‘les gilets jaunes’ or the yellow vests movement began after rising fuel prices were felt to disproportionately affect the working and middle class. Fuel taxes are a regressive tax, the burden of which is felt most strongly by the poorest in society and individuals who rely on their primary means of transport for work.

Practical issues can impact the implementation of a road pricing scheme. Singapore launched its Electronic Road Pricing (ERP) in September 1998, replacing the Area Licensing for restricted zones and Road Pricing Scheme for expressways. This process took about 9 years to implement. It has the necessary technology to flexibly charge motorists different prices for the use of different vehicles, roads, and at different times of the days. As of 2014, there were 77 gantries in Singapore.¹⁵ It must be noted however, that Singapore is a city-state with a land area of just over 700sq kilometres and has a robust public transport system. The similar implementation of such a scheme in the UK would need considerable public investment and innovation.

Germany is a more relevant comparator facing the same challenges for EV take up. EVs still make up less than 2% of new registrations in 2018 with short range, a lack of charging infrastructure and high purchase prices cited as the primary causes for slow uptake. A very similar situation to the prohibitory factors for UK motorists. They have provided an incentive for EVs of €6,000 (£5,280) but this still does not address the price imbalance for motorists.¹⁶ According to a study by Fraunhofer-ISI, the production of an EV causes 70-130% more CO₂ emissions than for conventional cars.¹⁷ The study found that because of the current energy mix and high emissions in electricity production, an EV would need to travel 150,000

kilometres before having a CO₂ advantage compared to a conventional car. Even considering a carbon neutral energy mix, the break-even point still remains at between 60,000-80,000km.¹⁸ The problem that both we and Germany face beyond transitioning to an EV road network is ensuring that our energy mix is sufficiently sourced from renewable energy.

Norway has been described as Europe's most advanced EV market and is set to ban the sale of ICE vehicles as early as 2025. In 2020, 54% of all new cars sold were fully electric, up from 42.1% in 2019. Norway has been able to achieve this goal through generous tax exemptions and grants.¹⁹ It has some of the highest taxes in the world including those on cars, and consequently the reduced tax on EVs and the incentives are bound to entice car buyers. These incentives include zero road tax, no VAT, free parking in some municipal car parks and a 50% discount is offered at some tolls and on ferries.²⁰

What we can learn from Norway on the road to decarbonisations is that the existing taxes on ICE vehicles have not been modified or increased but rather the attractiveness of EVs has been enhanced. It is this guiding principle that the government should adopt as it moves to decarbonise. The Norwegian energy mix also comes largely from near-zero carbon sources, such as hydroelectric or nuclear power. Norway still has the issue of insufficient charging infrastructure, but they are addressing this issue through investment in new charging points and developing more reliable chargers across their road network.

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Endnotes

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