



## Emission Testing of Plug-in Hybrid Vehicles (Utility Factors) Fact Sheet – January 2025

### What's changing and why?

Plug-in hybrid electric vehicles (PHEVs) have their CO<sub>2</sub> emissions calculated through the Worldwide harmonised Light vehicle Test Procedure (WLTP)<sup>1</sup> using a variable known as the utility factor (UF).

The UF represents the assumed share of driving done by PHEVs in electric mode (using the battery) compared to driving done using the internal combustion engine. Research has shown that the UF overestimates how often drivers charge their PHEVs.

In the real world PHEVs tend to be driven much more in petrol/diesel mode, which causes real-world PHEV CO<sub>2</sub> emissions to be higher than as determined by the UF calculations.

This has resulted in a globally-recognised performance gap between PHEV official type-approval figures and real-world CO<sub>2</sub> emissions. This gap is estimated to equate to a 243% increase in the UK, relative to values recorded under the WLTP test cycle.

To address this gap, the relevant UNECE Regulations and the EU UF are being updated. In Northern Ireland, this new UF will apply to **new models** brought out by manufacturers in 2025 and all **new** vehicle registrations in 2026. Some new models in Great Britain may also be affected as manufacturers currently have a choice between using the old and new UFs. If you are unsure it is best to check the approach with the individual manufacturers. The UK Government is planning to consult in 2025 on a proposal to mandate the new UF in Great Britain for all new vehicle registrations from 2026.

---

<sup>1</sup> Worldwide harmonised Light Vehicles Test Procedure (WLTP) measures a car or van's individual CO<sub>2</sub> value taking into account the vehicle mass, including optional equipment, tyre rolling resistance class and aerodynamics.

---

The purpose of this fact sheet is to provide general guidance and information only. Although every effort is made to ensure that the content is accurate, the BVRLA cannot accept any liability whatsoever for any inaccuracy contained within it, nor for any damage or loss, direct or indirect, which may be suffered as a result of any reliance placed upon the information provided, whether arising in contract, tort or in any other way.



## What will be the impact?

For this year, it will only be new models that will be impacted, and the manufacturers should be able to provide you with more information on what impact the changes have had on their PHEV models.

**There is no retrospective application**, so vehicles already registered or models already in circulation in 2025 will not be impacted.

The Department for Transport has provided a few indicative examples to give an idea of the potential CO<sub>2</sub> increases, these are:

- A PHEV with a current CO<sub>2</sub> figure of 10g/km and equivalent all electric range of 80km could increase to ~30g/km
- A PHEV with a current CO<sub>2</sub> figure of 10g/km and equivalent all electric range of 120km could increase to ~40g/km
- A PHEV with a current CO<sub>2</sub> figure of 30g/km and equivalent all electric range of 40km could increase to ~60g/km
- A PHEV with a current CO<sub>2</sub> figure of 30g/km and equivalent all electric range of 80km could increase to ~90g/km

## Next steps

Where the customer is considering a new model PHEV you may wish to liaise with the manufacturer to ensure you have accurate information about the CO<sub>2</sub> figure for the vehicle.

Where the customer is considering an existing model PHEV that will be delivered before 31 December 2025, no action is needed as there is no retrospective application.

Where the customer is considering an existing model PHEV that will be delivered **after** 31 December 2025 you may wish to liaise with the manufacturer to ensure you have accurate information about the CO<sub>2</sub> figure for the vehicle.

## Further Information

[DfT consultation on the phase out of petrol and diesel engine vehicles](#)

[European Commission – Press Release](#)

**BVRLA Contacts:** [legal@bvrla.co.uk](mailto:legal@bvrla.co.uk)

---

The purpose of this fact sheet is to provide general guidance and information only. Although every effort is made to ensure that the content is accurate, the BVRLA cannot accept any liability whatsoever for any inaccuracy contained within it, nor for any damage or loss, direct or indirect, which may be suffered as a result of any reliance placed upon the information provided, whether arising in contract, tort or in any other way.

Advice should always be obtained from your own professional advisers before committing to a specific action.