



SUPPORTING NISSAN FIGARO OWNERS AND ENTHUSIASTS
with over 1,000 Members across 40 Countries Worldwide

International Vehicle Standards Team
Department for Transport
Great Minster House
33 Horseferry Road
London, SW1P 4DR

5th September 2026

Consultation: Regulating environmental impact of in-use emissions of road vehicles

In keeping with the Figaro Owner's Club aims and objectives, we raise concerns on behalf of our members, about some of the proposals in the above-mentioned consultation.

About us

Question: What is your name?	Figaro Owners Club
Question: What is your email address?	hello@figaroownersclub.com
Question: Are you responding on behalf of an organisation?	Yes
Question: What is the name of your organisation?	Figaro Owners Club
Question: What best describes your organisation?	
Consumer focused organisation - We are the official membership car owners club for the Nissan Figaro	
Question: How many people does your response represent?	Over 1,000 club members
Question: Do you currently own at least one motor vehicle?	Yes
Question: If yes, what type of motor vehicle do you own?	car
Question: Do you regularly use at least one motor vehicle that is owned by someone else?	Yes
Question: If yes, what type of motor vehicle do you regularly use?	car

Proposal

Question: Do you agree or disagree with amending existing law so that all road vehicles should maintain the same emissions standards throughout life, as applied when they were built and first registered?	Disagree
Question: Do you agree or disagree that poor maintenance should be regulated? Explain why you think this.	Disagree
Question: Do you agree or disagree that vehicle modification should be regulated? Explain why you think this.	Disagree

Question: If you disagree, why do you think this?
The following responses relate to the above three questions. There are already rigorous emissions standard checks in place for cars on GB roads, such that creating additional checks add additional unnecessary red tape for owners and businesses.



SUPPORTING NISSAN FIGARO OWNERS AND ENTHUSIASTS
with over 1,000 Members across 40 Countries Worldwide

- Similarly, the servicing and MOT process for a car already determines the condition of the vehicle, such that poor maintenance should already be able to be identified from this.
- It is unclear what “road vehicles in-use in GB from 1 January 2001” means - the proposals assume that vehicles are built and registered in the UK at the same time, which is not the case for vehicles that are not made for the UK market and are imported to the UK.
- While we appreciate that the current proposals are set to “road vehicles in-use in GB from 1 January 2001” we are concerned that setting this precedence will ultimately impact on all older vehicles.
- There are differing views on the environmental impact of cars that already exist. For Figaro Owners Club members, the Nissan Figaro, manufactured in 1991 with a mere 1.0 litre engine, has very little environmental impact.
- We are concerned that further restrictions will have the following consequences:
 - Impact on the mental health of current owners who love their cars and the joy they spread with other onlookers.
 - Impact on current owners from being able to sustain the heritage of the cars due to the loss of infrastructure and businesses supporting older vehicles.
 - Prevent those who would also wish to see the Figaro marque sustainably retained on the roads, from having that choice.
 - Prevent those who wish to own a Figaro from having the choice to own one.
 - Severely impact engagement with younger prospective owners.
 - See the end to the heritage and legacy of older vehicles, ending the viability of car clubs, events and the positive community interaction and revenue that those kinds of events generate.
- The proposals do not take into consideration that an owner makes efforts to improve on their vehicle, including those who undertake works in their own time such as those who are on lower incomes who can save money by servicing their vehicle at home.
- The proposals suggest that spot checks can take place at any time, when owners may rely on their servicing and MOT to identify any issues that need addressing. It is unreasonable to expect any vehicle owner to continually be assessing their vehicle outside of the current annual process.
- The proposals do not take into consideration that for older vehicles, parts and components may become less available (some are already not available at all).
- The proposals assume that catalytic converters, for example, are always a positive from an emissions perspective, when we have discovered that some systems are actually very inefficient and do not necessarily work as intended.
- As a community we have businesses who have invested in developing technology to keep the cars on the road, such as a replacement ECU. This kind of investment to aid the better operation of the cars could be impacted by these kinds of rules, especially around modifications.



SUPPORTING NISSAN FIGARO OWNERS AND ENTHUSIASTS
with over 1,000 Members across 40 Countries Worldwide

As a community of owners, we have already been negatively impacted by poorly executed practices such as ULEZ which have seen grey imports impacted on the assumption that cars like the Nissan Figaro will have a negative impact on the environment. We urge that this is urgently addressed so that grey imports are not assumed to not comply with emissions standards but instead should be proved to not comply to emissions standards by the relevant authority wishing to apply emissions-based usage charges.

Question: Which of the following exempted situations do you think we should include in updated legislation?

faults that are outside the control of the owner and user in defined circumstances	N/A
vehicles brought into GB temporarily by a person who lives abroad (up to a total of 6 months in 12 months)	N/A
vehicles that are being driven to have an emission-control device fixed	N/A
vehicles that are being driven to a port for export	N/A
vehicle used off-road	N/A
other circumstances	N/A

Vehicle modification

Question: Do you agree or disagree that, where it is a known and proven fact that a particular modification will always result in illegal levels of emissions, this modification should be considered unlawful? Explain why you think this.

We would wish to understand what the mechanism would be to demonstrate a modification could be characterised in this way?

Other categories of vehicle

Question: Which of the following types of vehicles do you think an updated law controlling in-use emissions should apply to? Explain why you think this.

large and heavy passenger vehicles (category M3) – buses and coaches	No
large and heavy goods vehicles (category N3) – lorries	No
medium goods vehicles (category N2) – vans	No
medium passenger vehicles (category M2) – minibuses	No
small passenger vehicles (category M1) – cars and small vans	No
small goods vehicles (category N1) – vans	No
2-or 3-wheel vehicles and quadricycles (category L) – mopeds, scooters, motorcycles, tricycles, and quadricycles	No

Proposed timelines for implementation

Question: Do you agree or disagree that there should be a 6-month period of adjustment?

agree with 6 months	N/A
disagree with 6 months, the law should take effect as soon as it is passed	N/A
disagree with 6 months, the lead-in time should be less than that	N/A



SUPPORTING NISSAN FIGARO OWNERS AND ENTHUSIASTS
with over 1,000 Members across 40 Countries Worldwide

disagree with 6 months, the lead-in time should be more than that	N/A
Question: What is your chosen period and why?	
This legislation should not proceed at all as it stands	

Final Comments

Question: Do you have any other comments?
In keeping with the Figaro Owner's Club aims and objectives, we raise concerns on behalf of our members that these proposals appear to be based on a range of sweeping assumptions, focused on creating more burden and cost to the consumer and businesses. As a community of owners, we have already been negatively impacted by poorly executed practices such as ULEZ which have seen grey imports impacted on the assumption that cars like the Nissan Figaro will have a negative impact on the environment. We urge that this is urgently addressed so that grey imports are not assumed to not comply with emissions standards but instead should be proved to not comply to emissions standards by the relevant authority wishing to apply emissions-based usage charges. Due to how ambiguous the proposals are written and due to the lack of detail as far as the effect this would have on grey imports, we have no choice but to disagree with the proposal in totality. We welcome any revised proposals that may be put forward and would suggest that considerations be made for parts becoming obsolete (manufacturers often do not keep parts beyond five years) so we would recommend that the proposals be based on the age of a vehicle rather than a specific date – as applies with when vehicles become eligible for historic (classic) vehicle tax and MOT exemptions.

We ask that the Government withdraw these plans and demonstrate its support for the culture and heritage of Figaro Owners Club members, and the broader car club community.

Sincerely

Adam Woods
Chair, Figaro Owners Club