



**PAS 1899:2022**

**Electric Vehicles – Accessible  
charging - Specification**

THE CONSUMER COUNCIL RESPONSE

3 May 2022



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## 1. EXECUTIVE SUMMARY

PAS (Publicly Available Specification) 1899 Electric vehicles – Accessible charging – Specification, will be published under licence from The British Standards Institution.<sup>1</sup> Government policy is to ban the sale of new petrol and diesel cars and vans from 2030 which is leading to an increase in the use of electric vehicles (EV) which requires a significant network of public EV chargepoints. It is also predicted that there will be 2.7 million disabled drivers in ten years' time.<sup>2</sup> Therefore, the objective of this PAS is to ensure that all chargepoints are inclusive and accessible and can be used by all consumers, designed to relevant standards.

Given anticipated significant increase in demand for public chargepoints and the need for consumers to have these available and accessible the Consumer Council supports the publishing of this PAS. Having accessibility at the centre of chargepoint design and installation will avoid inconvenience for many consumers and the need for retrofitting.

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<sup>1</sup> The PAS process enables a specification to be rapidly developed in order to fulfil an immediate need in industry.

<sup>2</sup> [Electric Vehicle charging infrastructure for people living with disabilities \(motability.org.uk\)](https://www.motability.org.uk/electric-vehicle-charging-infrastructure-for-people-living-with-disabilities)

## 2. ABOUT US

The Consumer Council was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984 (The Order). We operate under the Department for the Economy on behalf of the Northern Ireland Executive.

We have statutory functions in relation to consumer affairs, energy, postal services, transport, water and sewerage, and food accessibility. These include responding to enquiries, investigating complaints, carrying out independent research, educating and empowering consumers, and advising government on matters relating to consumer affairs.

Our non-statutory functions educate and empower consumers against unfair or discriminatory practices in any market including financial services. We are also a designated super-complaints body under the Enterprise Act 2002 and the Financial Services and Markets Act 2013.

As an insight-led evidence based organisation, we:

- Provide consumers with expert advice and confidential guidance.
- Engage with government, regulators and consumer bodies to influence public policy.
- Empower consumers with the information and tools to build confidence and knowledge.
- Investigate and resolve consumer complaints under statutory and non-statutory functions.
- Undertake best practice research to identify and quantify emerging risks to consumers.
- Campaign for market reform as an advocate for consumer choice and protection.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998 to ensure government policies recognise consumer needs in rural areas, and promote equality of opportunity and good relations across a range of equality categories.

We represent and campaign on behalf of all Northern Ireland citizens, in particular those in vulnerable circumstances, and pay particular regard to consumers:

- who are disabled or have long term health conditions
- who are of pensionable age
- who are on low incomes
- who live in rural areas

We use a set of eight guiding principles developed by the United Nations to assess where the consumer interest lies, and develop and communicate our policies, interventions and support. These provide an agreed framework through which we approach regulatory and policy work.

**Figure 1: Consumer Principles**



The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

They serve to protect consumers, setting out the minimum standards expected from markets when delivering products or services in Northern Ireland. They also frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.

### 3. RESPONSE TO CONSULTATION

The Consumer Council welcomes this PAS which addresses findings of the Research Institute for Disabled consumers in 2020 that 'There is a lack of consideration of disabled motorists as users or potential users of electric vehicles' and 'The existing charging points infrastructure is not accessible for a large proportion of disabled people with mobility or dexterity impairments'.<sup>3</sup>

#### Case study

The following case study from Guide Dogs NI demonstrates why this PAS is necessary. The charging cable is trailed across the footpath at the particular EV charging point when it is in use in a NI supermarket carpark. This has been raised as an issue to Guide Dogs NI by a guide dog owner. It is a hazard for people using the footpath. Guide Dogs NI has raised the issue with the supermarket customer services and were informed there is no mechanism for Guide Dogs to have a record of the complaint being registered or to know how it has been dealt with. This is expected to be of growing concern as increasing numbers of chargepoints are installed.

#### Overarching comments

The Consumer Council agree that there is an opportunity to ensure that accessibility is embedded in public chargepoints during design and installation which will avoid inconvenience for consumers and the need to retrofit. Accessibility for all consumers should be central to decision making in this area.

Whilst this PAS specifies the minimum level of accessibility for all charging bays, we strongly encourage procurers of public chargepoints to go beyond this wherever possible and implement the best practice guidance which is provided in annexes to the PAS document.

Issues around charging rates, prices and payment methods are not covered in this PAS but are of great importance and interest to consumers. The price needs to be affordable to low income users and consumers should be protected from excessive charging. Payment methods should also be standardised across different chargepoints and where possible contactless bank account payments and cash payment facilities should be available. Such options will make it easy for consumers to use. We welcome that payment methods are addressed in other policy developments from OZEV.

Page 10 of the PAS states '*The ultimate onus of responsibility for conforming to the requirements within the PAS lies with the procurer of the public chargepoints, who also oversees the placement and installation of public chargepoints.*' We ask for confirmation of how compliance with the PAS will be assessed and what the process is where a procurer does not conform to the requirements?

**Recommendation:** the compliance and enforcement process should be clearly explained within this PAS.

We agree with the approach to allow varying requirements for minimum accessibility according to different types and location of public chargepoints. For example, higher powered chargepoints which may have heavier cables.

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<sup>3</sup> [RiDC ElectricCars Report.pdf](#)

**Recommendation:** owners of existing public chargepoints should be required to assess how accessible and inclusive their chargepoints are currently and make any necessary improvements in accordance with the PAS once published.

### Specific comments

Page 14 states *'NOTE 1 Annex A and Annex B provide further guidance and best practice on establishing an inclusive environment around public chargepoints and on the provision of information services for chargepoints, respectively. It is strongly recommended that this best practice guidance is implemented to improve the accessibility of public chargepoints for all users.'*

**Recommendation:** The text which we have underlined in the above paragraph should be highlighted in the published document to draw importance to the point that procurers should aim to go beyond the minimum standard set in the PAS.

With reference to the section 'COMMENTARY ON CLAUSE 5' (page 16), we are pleased that the range of issues and barriers regarding chargepoints which individuals with different impairments and needs may have, are recognised in the PAS. This will help ensure procurers achieve an inclusive design.

Commentary on 5.2 states:

*'The heights of the various components of public chargepoints (such as the height of the chargepoint socket, charging cable, any cable management system, screen and/or visual interface height and the height of a payment terminal) should be suitable for all users including disabled people, in particular users of wheelchairs, other mobility aids, those of short stature and those who have dexterity impairment. The heights of different chargepoint components should be accessible from both a fully standing and seated position.'*

**Recommendation:** The text 'should', as we have underlined in the above paragraph, should be changed to 'shall'.

Section 5.4 Chargepoint connection Note 2 states *'From a safety perspective, it is desirable to incorporate a safe connector release mechanism into the chargepoint connector, to ensure an electric vehicle user can drive away whilst a vehicle is charging if their safety is perceived to be at risk.'*

**Recommendation:** We wish to highlight that safety is important to all consumers. Therefore, we recommend that consideration should be given to the merit of making the above Note 2 a mandatory rather than desirable requirement.

Also, with regards to safety, we welcome that lighting around public chargepoints and provision of security cameras is addressed in Annex A and advocate that chargepoints should be well lit, particularly at night and where possible located in an area which is not secluded.

**Recommendation:** Suitable contact information should be provided at chargepoints for consumers to register complaints, defective equipment/lighting and to report adverse incidents.

With reference to 6.5 Space Surrounding chargepoint (page 24) – a clear standard should be set to ensure pavement / footway widths are maintained for other users. Consideration should be given to specifying a minimum footway width below which it is not suitable to install charging infrastructure. For example, Guide Dogs policy position on EV charging points states, (*where*)

*‘Charging points are installed on the pavement, there should be a clear width of 2m on the pavement for pedestrians to get around, and they should be located by the kerb edge.’*

In certain situations where bespoke user testing/site visit or role play may be useful to confirm suitability of a particular site this should be facilitated. For current chargepoints user testing should be encouraged where this is identified as being useful. For example, the Consumer Council assists in facilitating Airport Accessibility Forums in NI through a site visit with disabled people and/or their representatives and provides a report with recommendations to the airports to improve accessibility.

**Recommendation:** The statement on page 27: *7.3 Level access points and dropped kerbs ‘.....a dropped kerb shall be provided within a maximum of 50 m of the chargepoint, and shall ideally be within a maximum of 20 m distance of a chargepoint, where no existing dropped kerbs or pavement’* should be strengthened, for example to include: where a dropped kerb cannot be facilitated within a maximum of 20m, reasoning should be provided in written format of which procurers should be required to keep a record should it be queried and for auditing purposes.

With regard to *Commentary on 7.4 (page 27)*

*(Whilst accessible and family parking bays are often located near venues or amenities for which the accessible parking bay is associated, public chargepoints installed for general use in car parks and other locations can be situated in any location.)*. We advocate that clear signposting should be provided to assist consumers to locate chargepoints and recognise that this is included in Annex A, A.3.

We welcome this inclusion of *Commentary on 8.2 page 28* which states:

*‘Provision of data and information regarding the locations and characteristics of public chargepoints can assist disabled people in knowing in advance where they are able to charge their vehicles, thereby giving greater confidence to disabled drivers to plan their journeys in advance.’*

Consumers should have access to up-to-date information which is accessible and useful e.g. where chargepoints are located and accessibility status, such as, if it is necessary to access a drop kerb then provide details on where the drop kerb it is located. Facilitating this will encourage confidence in EV charging and therefore encourage EV uptake which will assist in decarbonising private transport.

## **4. CONCLUSION**

The Consumer Council supports the development of a PAS for EV accessible charging. We have made some recommendations which we believe should be given consideration to maximise benefits for consumers.

## **5. CONTACT INFORMATION**

To discuss our response in more detail, please contact:

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