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Building a Brighter Future
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By email only: consultation@ccav.gov.uk

Dear Sir/Madam,

Automated vehicles: protecting marketing terms

APIL welcomes the opportunity to respond to the Department for Transport's and Centre for Connected and Autonomous Vehicles' consultation on protecting the use of certain terms in vehicle marketing regarding automation.

We strongly agree that the use of certain terms should be reserved for authorised automated vehicles, and with the broader provision regarding the marketing of vehicles.

We believe the proposals will be important to increase public trust, understanding and support for the safe introduction of automated vehicles on UK roads. The proposals will help prevent consumers from being misled about a vehicle's true capabilities. Consumers will likely accept the information provided by, for example, sales representatives, that a vehicle can fully drive itself without reviewing its features. This can create significant safety risks if systems that require continuous human supervision are marketed as "full self-driving".

We agree with the list of protected terms proposed in the consultation document and that other grammatical forms of protected terms should also be in scope.

We hope our comments prove useful.

Yours sincerely,

Ana Ramos
Legal Policy Officer