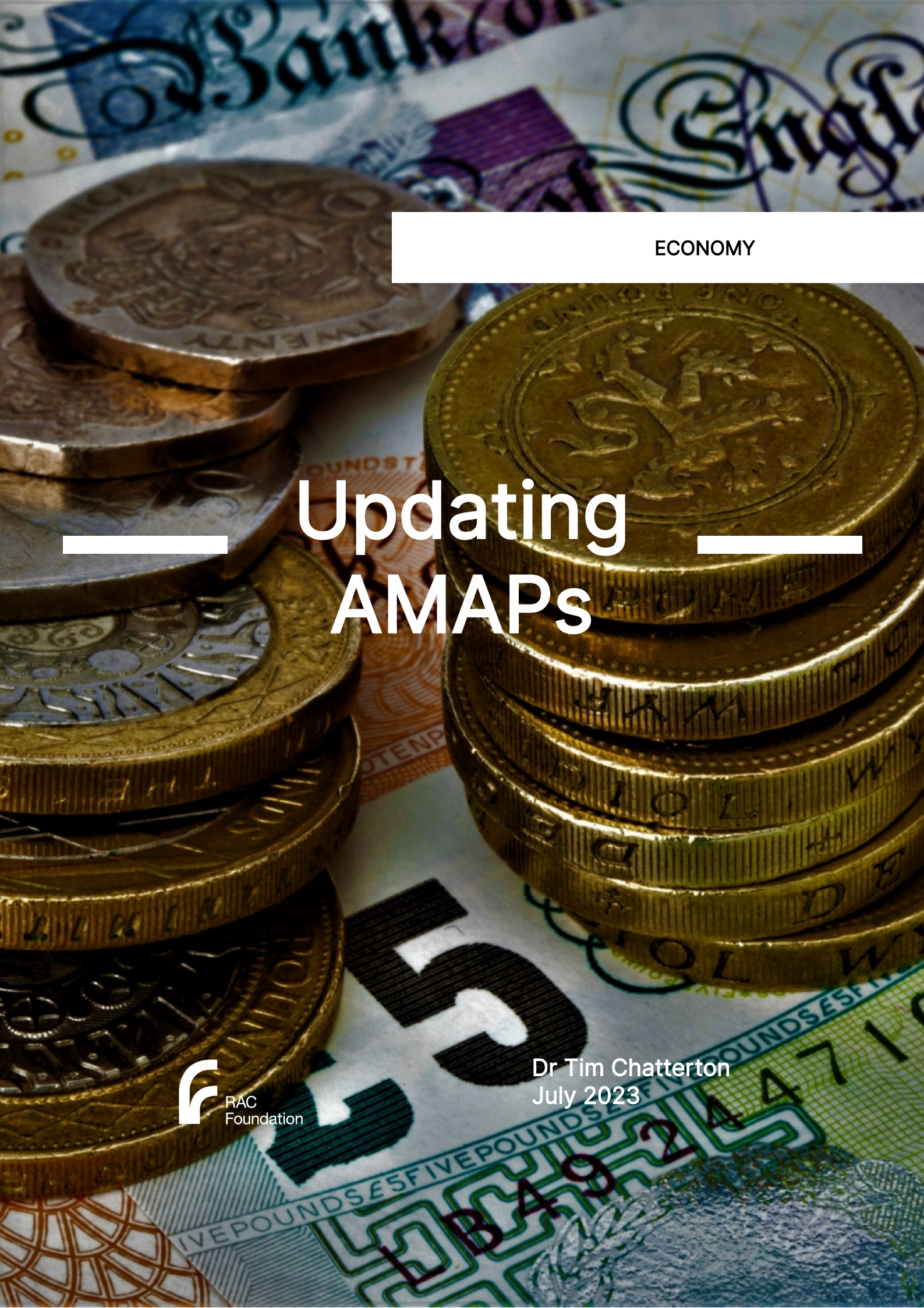

ECONOMY

Updating AMAPs

Dr Tim Chatterton
July 2023

RAC Foundation

Table of Contents

Introduction

This paper sets out to answer the question, *"Accepting that the 45p rate for Approved Mileage Allowance Payments set in April 2011 was appropriate, what should the rate be in 2023, and how might it be readily and robustly updated on a regular basis?"*

The paper sets out a methodology by which it could be calculated and regularly updated using Government data, and concludes that a new value of 63-64p would be appropriate as of April 2023.

Mileage Allowance Payments

HM Revenue and Customs (HMRC) defines Mileage Allowance Payments (MAPs) as the amounts paid to employees to reimburse them for using a personal vehicle for business travel. The reimbursement might be paid as a lump sum, a fixed rate per mile, or a reimbursement for the actual expenditure incurred. Reimbursing employee business travel is fully at the discretion of the employer.

Approved Mileage Allowance Payments

Approved Mileage Allowance Payments are those that fall within a (per mile) limit, set by HMRC, within sections 229 to 236 of the Income Tax (Earnings and Pensions) Act (ITEPA, 2003). Up to this limit, which depends on vehicle type, MAPs are untaxed and not liable for National Insurance contributions (under the Social Security (Contributions) (Amendments) Regulations 2002) and do not need to be declared to HMRC.

A detailed overview of Mileage Allowance payments has been published recently by the House of Commons Library (Masala et al., 2023a)

What do AMAPs represent?

The Government says AMAPs rates "aim to reflect running costs including fuel, servicing and depreciation. Depreciation is estimated to constitute the most significant proportion of the AMAP rates." (UK Parliament, 2022) There is no formula or calculation which delivers the AMAPs rates for cars (Masala et al., 2023a), rather the decision on what rates to adopt is a policy decision taken by the Chancellor after considering a range of factors. These factors include:

- the costs of motoring per business mile for a range of cars and mileages;
- the transport needs of business;
- the cost to the Exchequer of changing the rate; and
- the overall fiscal position.

The level at which the AMAP rate is set has no direct bearing on the rate at which an employer need reimburse staff for using their own car in the line of work. Employers may choose to reimburse employees at either greater or lesser rates. However, the AMAP level both sends out a strong message about appropriate mileage reimbursement rates, and the bureaucratic simplicity of sticking within it with regard to tax calculations (on both the part of employers and/or employees) creates an incentive not to pay more.

The Approved Mileage Allowance Payment (AMAP) or Approved Mileage Rate (AMR) was first set in 2002 and has subsequently been revised only once, in 2011. The rates set are shown in Tables 1 and 2. Particularly since road fuel prices began increasing in 2020, and especially since 2022, there have been calls for the rates to be increased from a wide range of bodies (Masala et al., 2023b).

This short report considers some of the available evidence of changes in motoring costs and sets out some methods by which a new rate might be set. It is, however, worth reiterating that there was never a clear formula set out for calculating the rate, the overarching factor in setting it was not grounded in any of the individual components that it seeks to represent, rather it represents the level at which the Treasury could accept mileage payments to be untaxed.

Table 1: AMAP Rates 2002

From tax year 2002/3 to 2011	First 10,000 miles	Each mile over 10,000 miles
Cars and vans	40p	25p
Motorcycles	24p	24p
Bicycles	20p	20p

Table 2: AMAP Rates 2011

From tax year 2011/12 onwards	First 10,000 miles	Each mile over 10,000 miles
Cars and vans	45p	25p
Motorcycles	24p	24p
Bicycles	20p	20p

Advisory Fuel Rates

This section discusses the Advisory Fuel Rates for Company Cars as a comparison to the AMAP. The comparison is given to highlight the fact that the Treasury already manages one set of regularly updated mileage rates, and as such, the proposed methodology set out in this document would not be significantly onerous and could be merged with an extant and very similar workstream.

The Advisory Fuel Rates (AFR) are specifically for employees using a company car, in order to either reimburse them for business travel in their company cars, or for them to repay the cost of fuel used for private travel. These rates are set quarterly, varying on both fuel prices and the fuel efficiency of vehicles, based on the average (mean) miles per gallon of manufacturers' sales of cars to businesses (Fleet Audits average). Unlike the AMAP, these are intended to cover *only* the fuel component of mileage costs, the other costs being covered by the employer already as it is a company car.

The AFRs are set for three engine sizes (based on cylinder capacity) across a range of fuel types. These are principally petrol, diesel and LPG. Hybrid cars (including plug-in hybrids) are reimbursed according to the fossil fuel component of the car's fuel consumption and there is a separate rate for fully electric cars. As with AMAPs, it is important to note that these rates are advisory rather than mandatory, so employers can choose to use them or set their own rates (providing that these can be justified to the HRMC).

Box 1: Calculation of Advisory Fuel Rate

The mean miles per gallon (MPG) is taken from manufacturers' information, taking into account annual sales to businesses (Fleet Audits average 2019 to 2021).

The 'rates per mile' calculated in these tables are shown rounded to one decimal place, but the final advisory fuel rates are rounded to the nearest whole penny.

Rates per mile which end in 0.5 are rounded down to the nearest whole penny for the advisory fuel rate when the underlying unrounded figure ends in a number less than 0.5 (for example 0.487).

When the underlying unrounded figure ends in a number greater than 0.5 (for example 0.513) it is rounded up to the nearest whole penny.

HMRC guidance on advisory fuel rates:
https://www.gov.uk/guidance/advisory-fuel-rates

Clearly, the AFR, with its quarterly updating, sets some precedent with regard to whether the AMAPs should be updated (and how frequently). Even if they were to be updated annually, or even just every decade this would arguably be a significant improvement on the current situation.

Variations in the Advisory Fuel Rate

Advisory Fuel Rates were established under the same legislation as AMAPs in 2002/3. Figure 1 shows variations in the petrol and diesel AFRs since the updating of AMAP in 2011 (these were taken from Taxpot.co.uk. Earlier dates were not included due to lack of archived information on historical AFR rates).

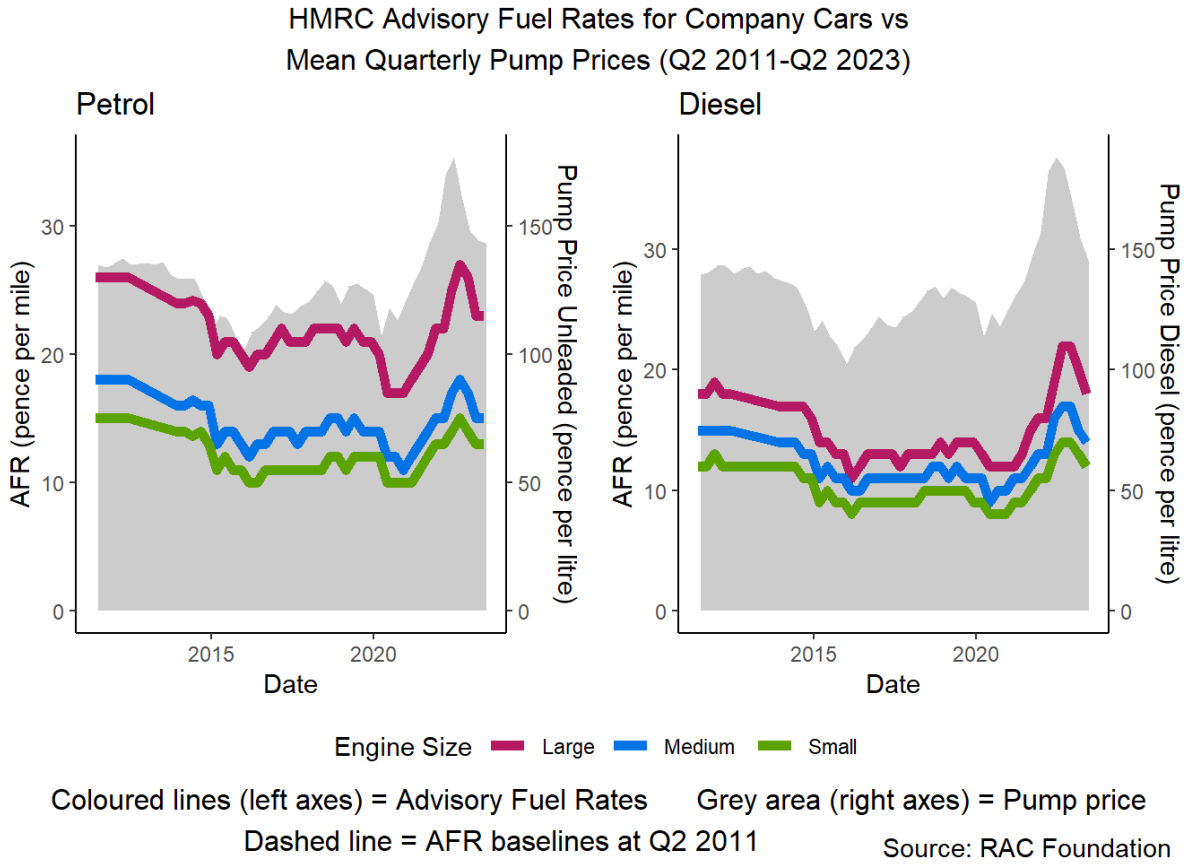

Figure 1: AFR vs pump prices (2003-23)

These graphs clearly show how there have been significant fluctuations in both the AFR and in UK fuel pump prices since 2011. It is worth noting that had a flat rate been set for the AFR in 2011 (as with AMAP), then AFR calculated costs would have been below that (hypothetical) fixed AFR rate, leading to an estimated profit for drivers of company cars over 75% of the time. At some points the calculated AFR costs were up to 40% below the 2011 origin rate. This demonstrates that regular updating of per mileage costs has the potential, not just for helping ensure fairer outcomes for business car users, but also, at times, of saving the Exchequer money.

AFRs have not increased as much as pump prices have since 2011. This is due to the element of the formula that is pegged to fuel economy of fleet vehicles less than

3 years old as the AFR only applies to company cars. Fuel cost and tax concerns significantly influence fuel economy in this sector and so new company cars can be expected to be an especially economical subset of the parc. Consequently, the cars that the AFR is based on have become more fuel efficient (in aggregate) over time. In fact, whilst the AFR for most small and large engine diesel cars has increased to a small degree (medium engine diesel cars remaining on a par), the AFR for all petrol vehicles has decreased (see Table 3). All remain below the rate at which pump prices have risen over this period. Therefore, despite the recent increases in pump prices, estimated fuel costs per mile for company cars have largely decreased over the last 12 years.

Table 3: Changes in Advisory Fuel Rates between Q2 2011 and Q2 2023

Fuel (Engine Size)	% Change
Petrol (Small)	-13.3%
Petrol (Medium)	-16.7%
Petrol (Large)	-11.5%
Diesel (Small)	8.3%
Diesel (Medium)	0%
Diesel (Large)	11.1%

How do AMAPs differ from AFRs?

As indicated above, whilst fuel is an important component of the costs that the AMAPs are deemed to represent, particularly as it is the main *per mile* cost that is incurred by employees driving for work, there is a range of other costs that it covers: tax, insurance, servicing and depreciation.

Figure 2 shows the variations in the AFR by fuel type and engine size as a percentage of the 45p AMAP rate. This has varied between 17.8% and 60% since 2011.

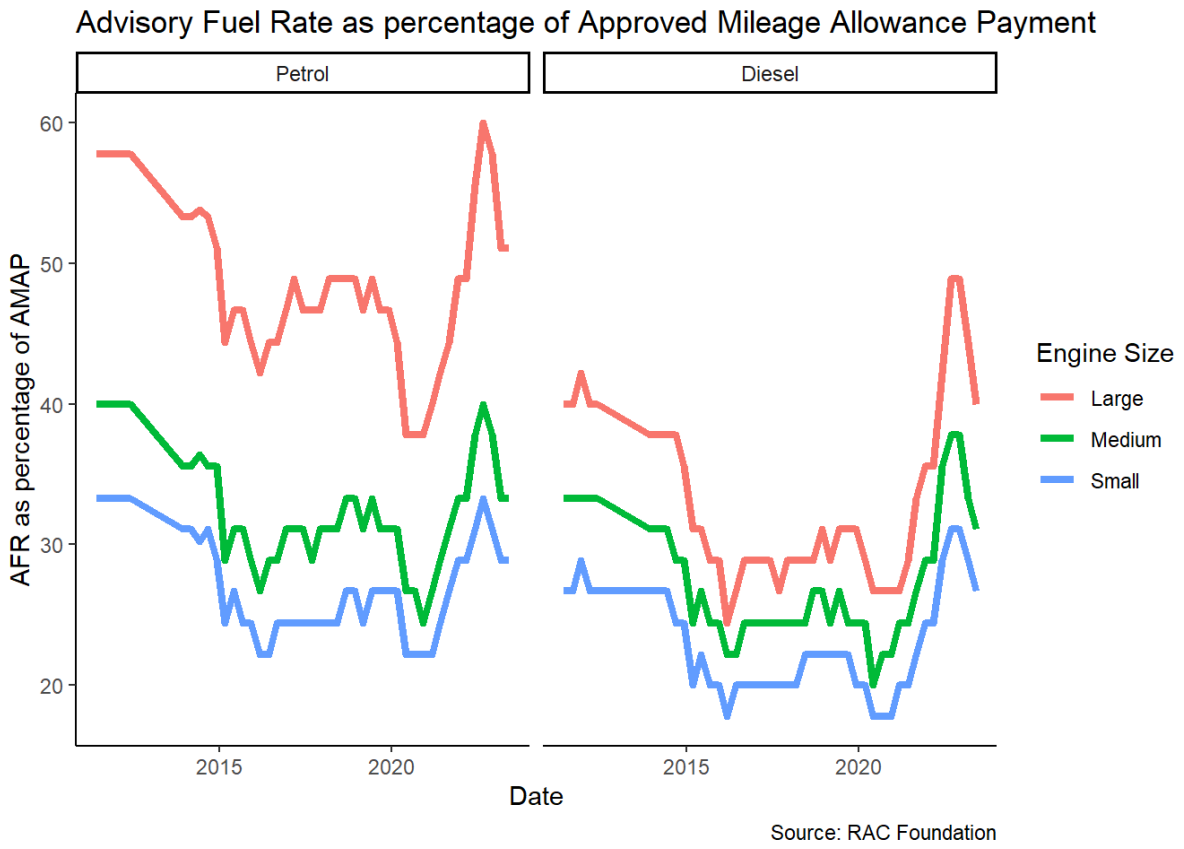

Figure 2: AFR as percentage of AMAP (2011-23)

Therefore, if the AFR were to be taken as a reasonable estimate of fuel costs, this would suggest that the AMAP was leaving between 18p and 37p per mile over and above fuel costs to cover the remaining costs borne by car owners.

However, it is relevant to remember that the AFR, being linked to new car fuel efficiency, is likely to underestimate the fuel costs of the broader, older, fleet of cars used in course of work as discussed below. This is primarily because they are based on the efficiency of the newest (less than 3 year old) fleet purchased cars. As we show in the next section, these company cars under three years old are not representative of those vehicles being driven by people who have to use their own cars for work.

Public sector cars

A survey was undertaken by the public service union UNISON of its members in Spring 2023. UNISON is the UK's largest union, serving more than 1.3 million members employed in the provision of public services] (UNISON, 2020). The survey received 960 responses from people who use their own car for work purposes. From this, 885 valid number plates were available to analyse. For a population of this size, a sample size of only 663 would provide a 99% confidence level, and 5% margin of error (Qualtrics, 2023) and so the number of responses received was considered more than adequate.

Age of vehicles

Figures 3 and 4 show that the majority of UNISON members' cars (55%) are between 4 and 10 years old. The main difference between this and the UK parc is a greater proportion of cars between 5 and 12 years old. This suggests that the AFR rates based on the efficiency of the latest 3 years of fleet sales may underestimate per mile fuel costs for the average person who drives their own car for work.

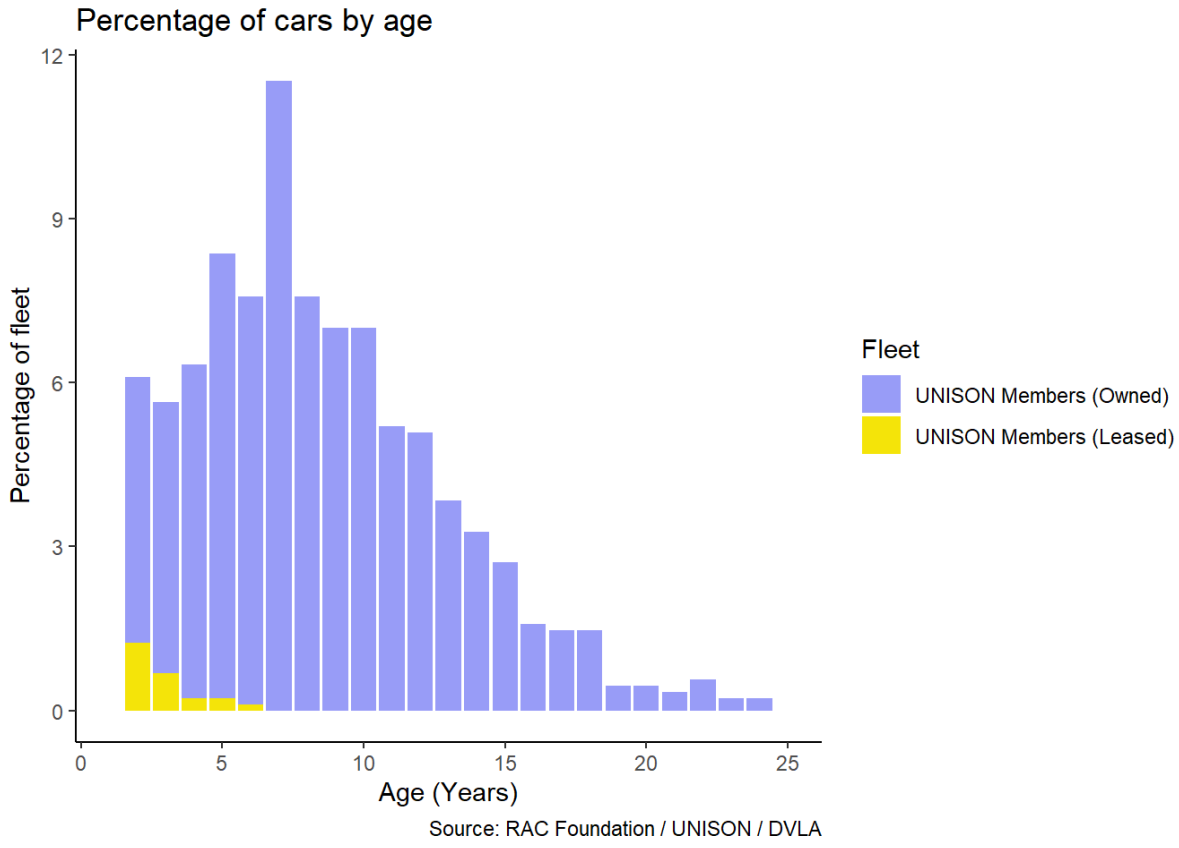

Figure 3: Age of UNISON members cars from survey (2023)

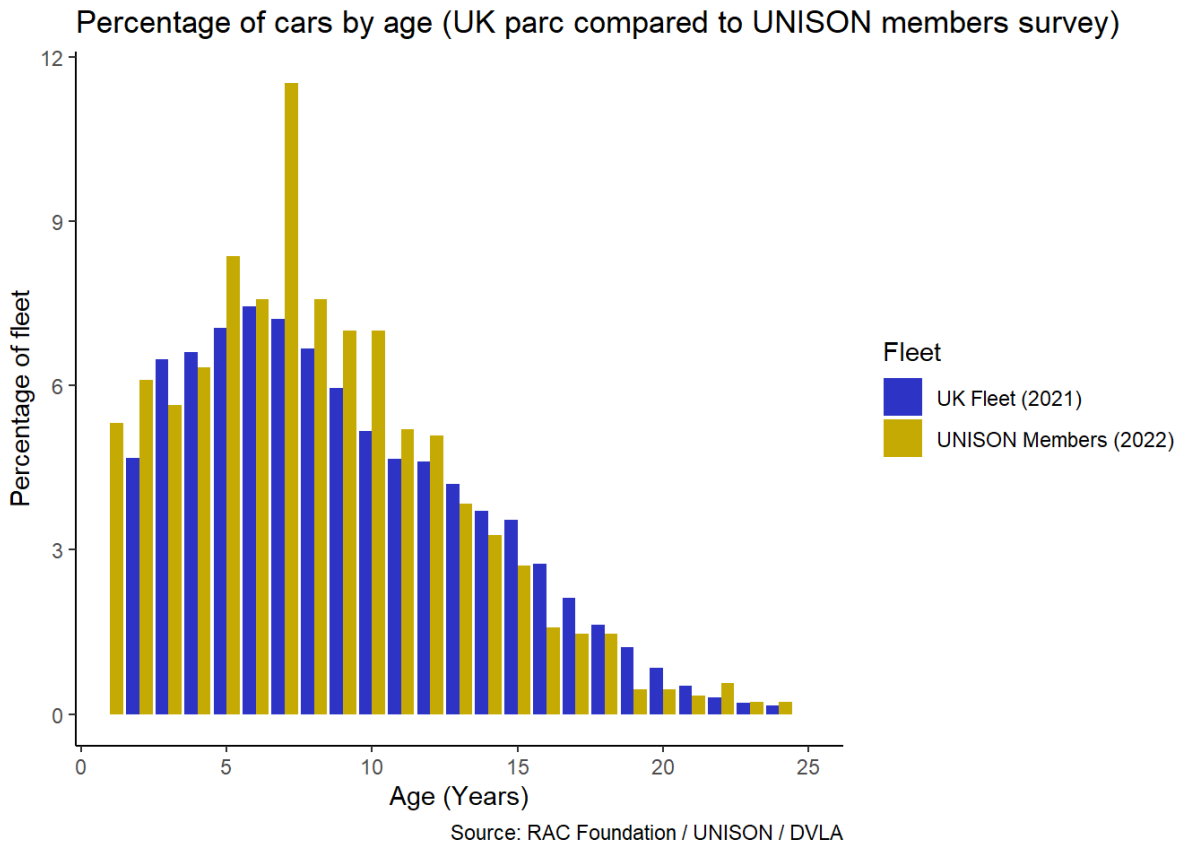

Figure 4: Age of UNISON members cars compared to national parc

Fuel type and efficiency

Figure 5 shows the proportions of different fuel types revealed in the UNISON survey compared to the proportions in the UK fleet overall for 2022. This data shows that, whilst petrol cars are still more popular with UNISON members than diesel cars, there is a greater tendency for owning diesel cars amongst this sample.

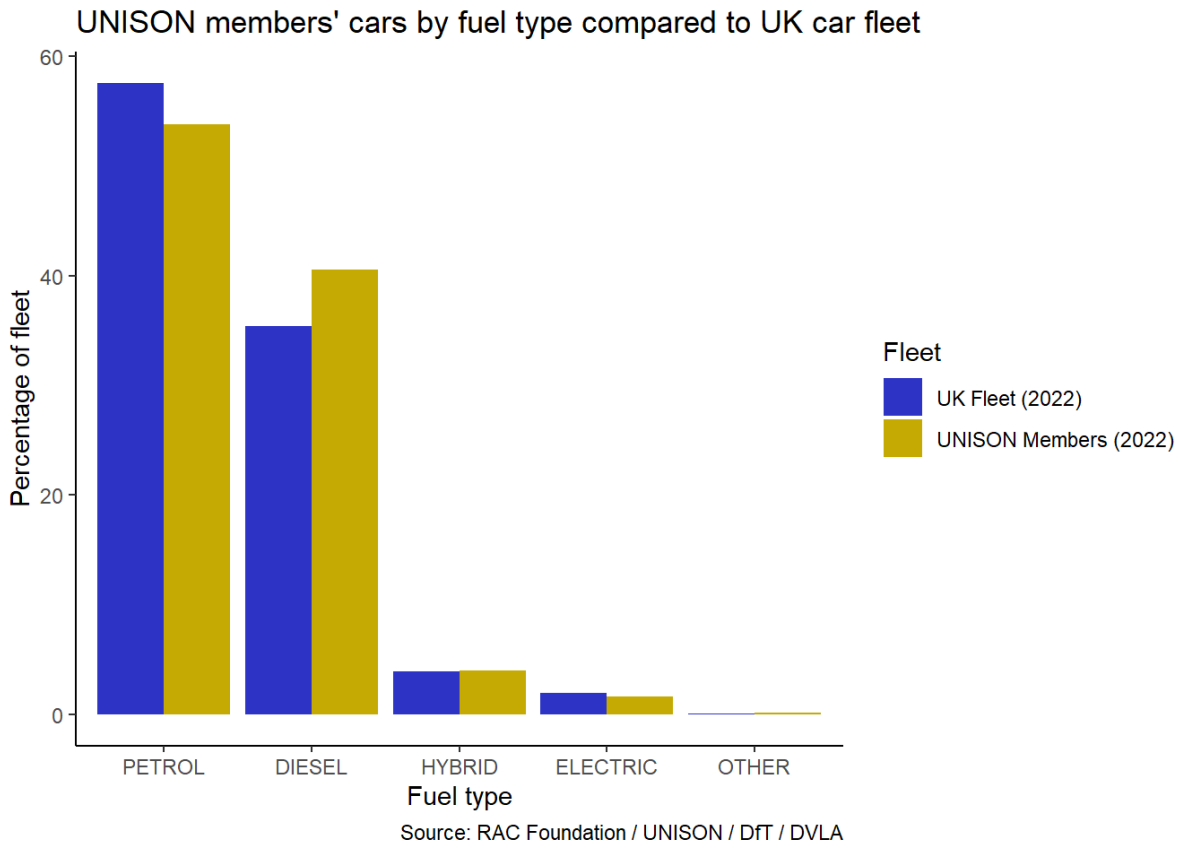

Figure 5: Fuel type of UNISON members cars compared to national parc

Figure 6 shows a comparison of fuel efficiency (using CO_2 emissions as an indicator of fuel consumption) between the cars identified in the UNISON survey and the average figure for cars of the same age and fuel type across the entire parc. 73% of of the UNISON cars were more efficient than the parc averages for similar age and fuel vehicles.

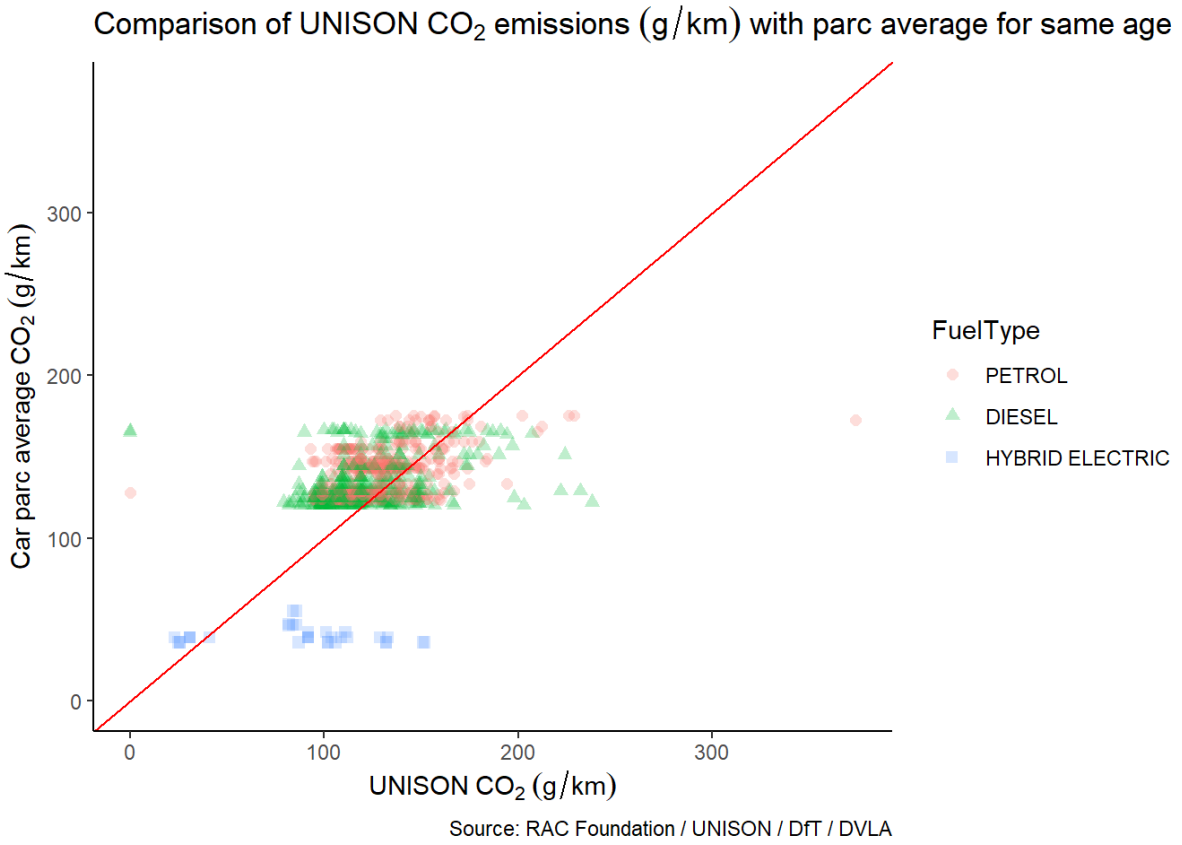

Figure 6: Comparison of UNISON CO_2 emissions (g/km) with parc average for same age

Distances driven

Figure 7 shows the mileage of each of the cars identified from the UNISON survey compared with the UK average for cars of the same age and fuel type in 2022. The darker the dot, the older the car (this shows that older cars in the UK are, on average, drive less).

Where dots lie below/to the right of the red 1:1 line, this indicates that the UNISON car was driven further than average. The further to to the right it lies, the greater the extra mileage driven was. 59% of UNISON petrol cars and 53% of UNISON diesel were driven further than the averages. On average, UNISON cars were driven 1,390 miles more than the UK average and, in one extreme case, 19,447 more than average.

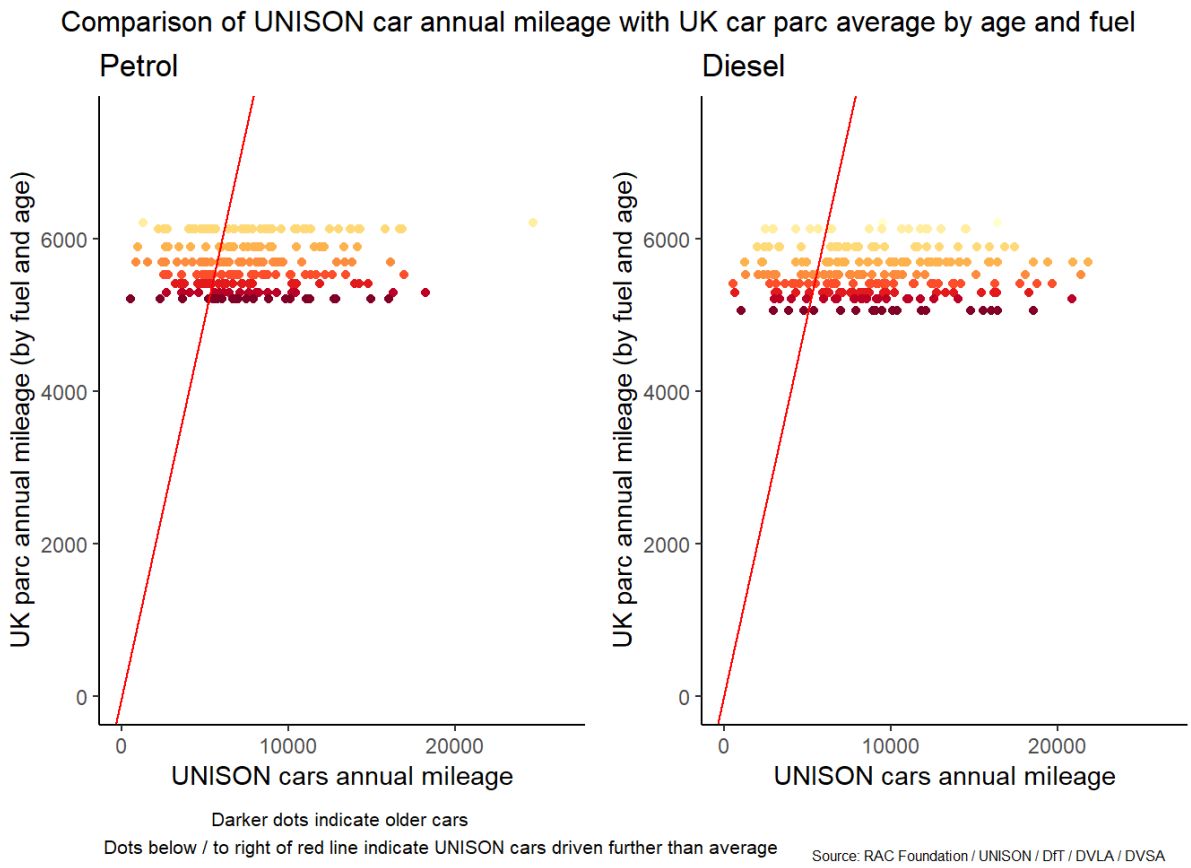

Figure 7: Distances driven by UNISON members compared to national parc

Changing costs

We present here three different approaches to modelling changes in motoring costs and, consequently, per mile costs of motoring. These have been kept relatively simple and all rely on data from Government.

Model 1 was designed as a simple method to allow AMAP rates to be regularly updated. In order to check the validity of this model, Models 2 and 3 were developed to validate and verify the outcome of Model 1. Models 2 and 3 are significantly more complex and have been presented here, not as suggested alternatives to Model 1, but only as a way of testing the robustness of the main proposal.

Changes in ONS monitored motoring costs

The ONS publishes changes in the cost of motoring expenditure as part of its RPI data https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/chbk/mm23. This runs from 1987 as a base year and produces monthly figures less than 1 month in arrears. These include a price index for variability of overall household motoring costs, which is shown in Figure 9 as the percentage change in costs from April 2011 to April 2023.

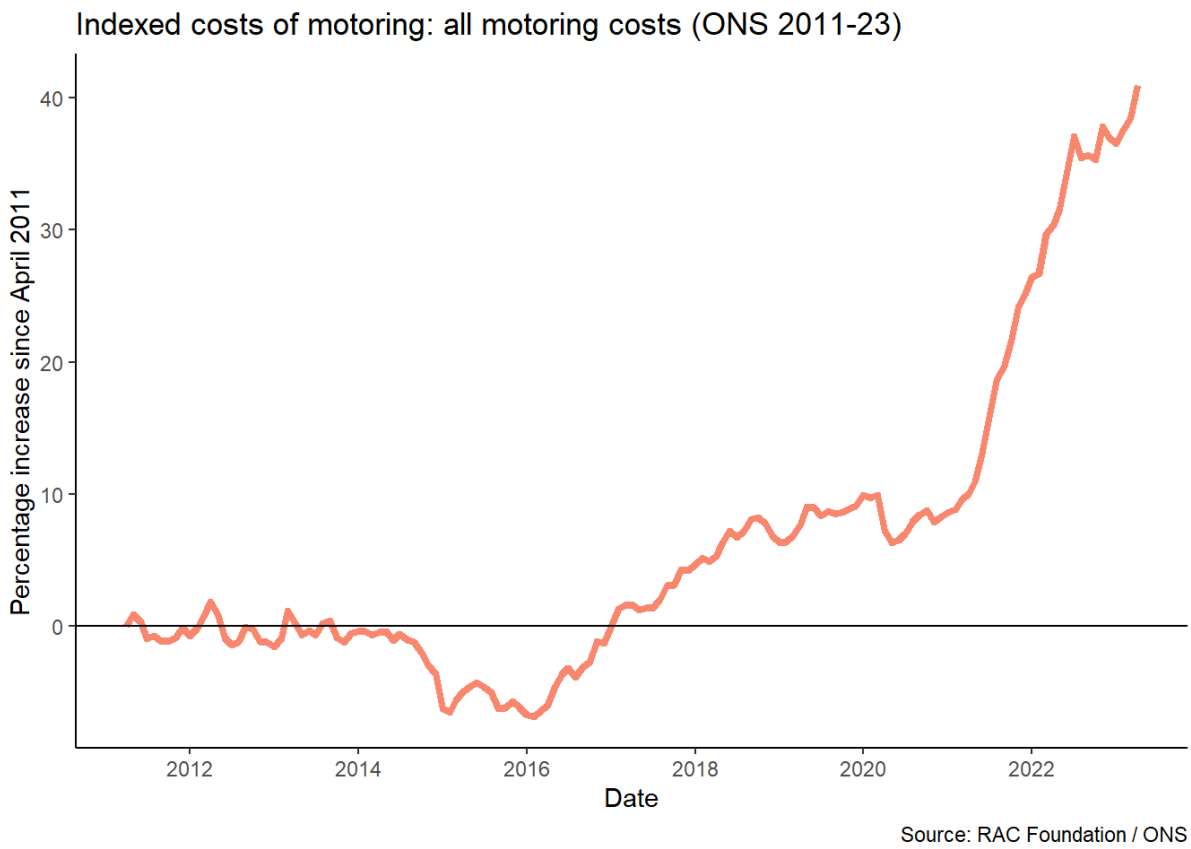

Figure 8: Percentage change in motoring costs from ONS Retail Price Index (2011-23)

The ONS calculated figure for all motoring costs is based on the weighted sum of a range of components of expenditure that can be grouped into five main groups: Purchase, Maintenance, Petrol & Oil, and Tax & Insurance. Figure 9 shows the percentage change in these components between April 2011 and April 2023 (as well as an overall motoring costs from the last figure). It is important to note that these figures represent the *relative* changes to prices *not* the proportion that they make up of motoring costs. As can be seen in the chart, over the entire period, fuel costs have been the component that has proportionally increased least over the last 12 years, whilst tax and insurance are the components that have proportionally increased most. Because fuel price is the only motoring cost that motorists see frequently, it is easy for them to assume that changes in motoring costs are changes predominantly due to fluctuating fuel costs. This graph reminds us of the important role of other costs, including those that motorists only see once per year, or may choose to defer in harder times (such as maintenance).

Efforts have been made to differentiate between costs and expenditure as far as possible within this report, with expenditure referring to how much a household or individual actually spends in a given time period, and cost referring to the price of an idealised sum of necessary, or at least normal, motoring goods. There are places at the interface of these, particularly in establishing *costs per mile*, where this differentiation is not simple. Consequently, the reader is encouraged to bear this important distinction in mind in interpreting this report.

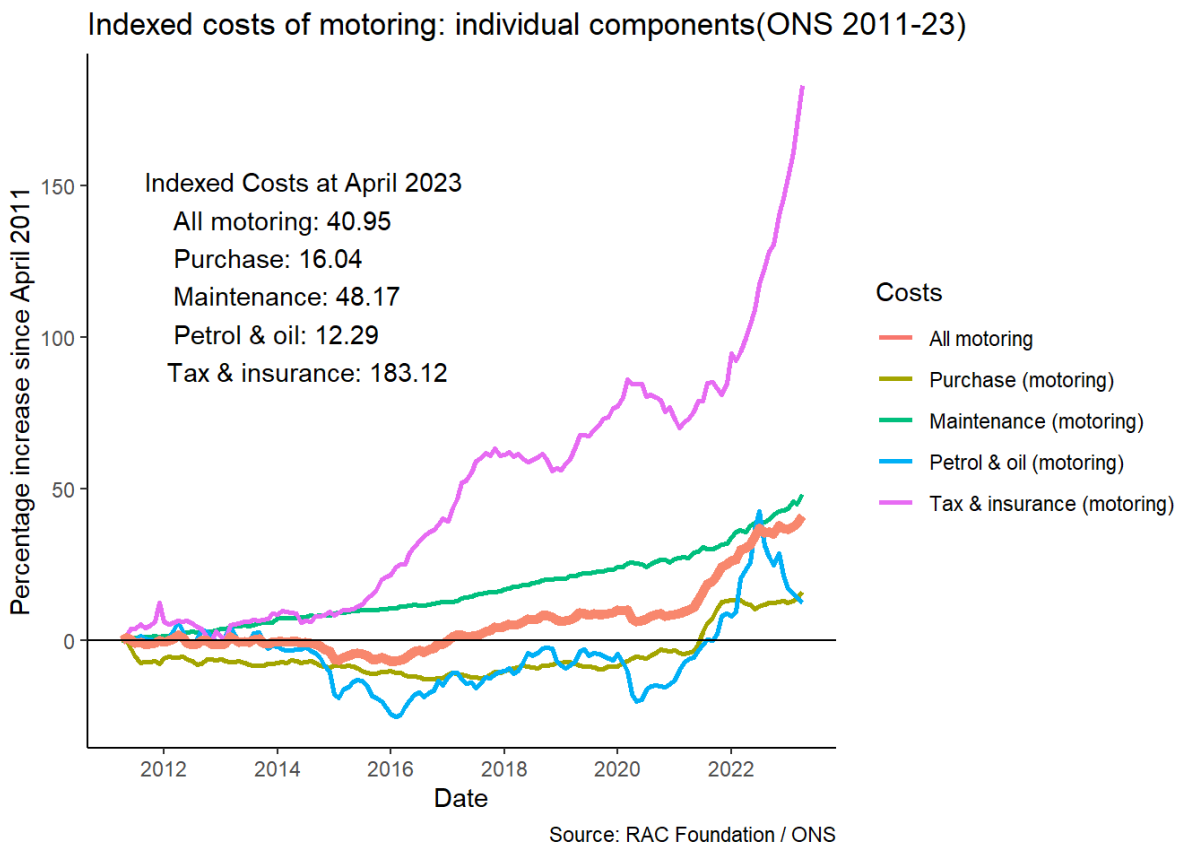

Figure 9: Increase in motoring costs from ONS Retail Price Index (2011-23)

To emphasise the difference between changes in costs of components in comparison to proportional expenditure on each component, Figure 10 shows estimates of average household expenditure on motoring per car for 2011 and 2023 (for households with at least one car). The data for these sources is explained in the sections that follow. It is very important to note that increases in costs (as indicated by the ONS RPI figures) do not necessarily relate to increases in expenditure on those components. This is because, particularly in the context of a wider cost of living crisis, increases in costs across the board may well lead to households cutting back on expenditure on certain items (for example, in the case of motoring, by buying a smaller cheaper car, reducing discretionary journeys, or even skimping on upkeep and maintenance).

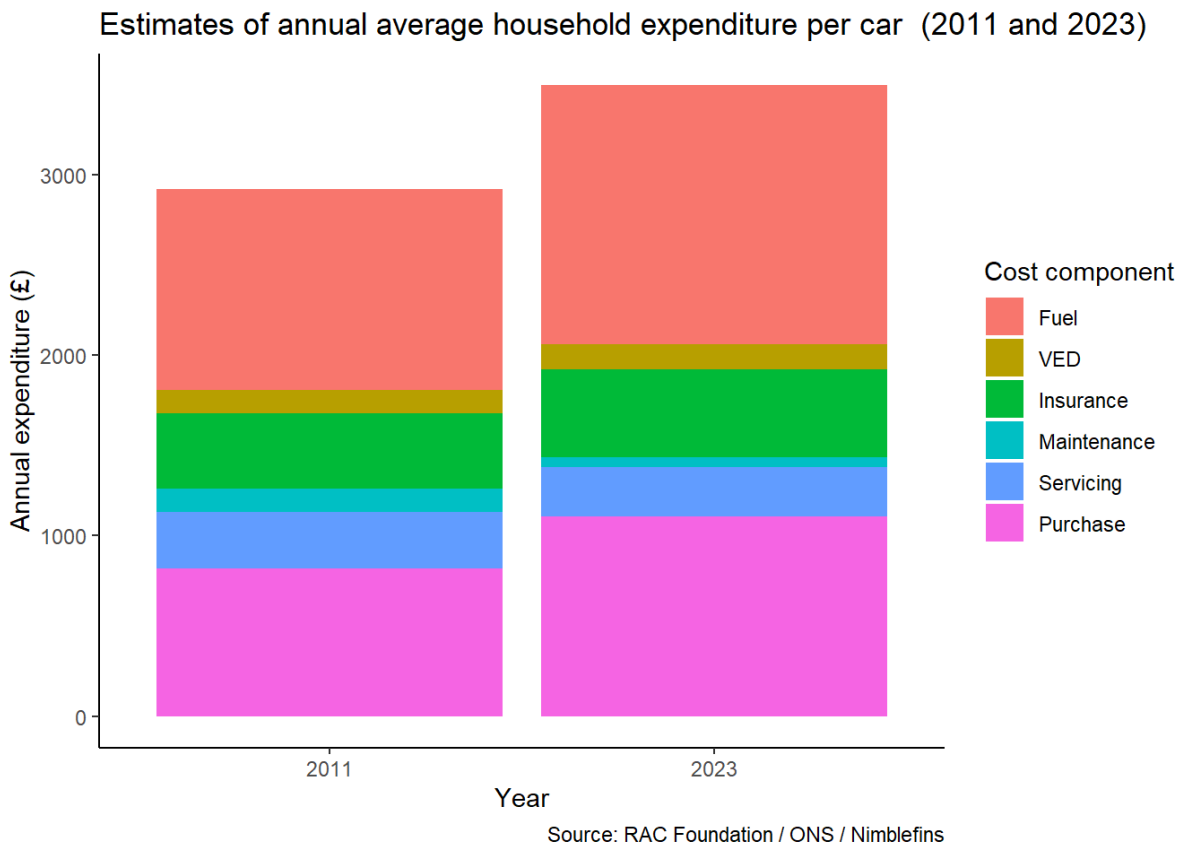

Figure 10: Estimates of annual average household expenditure per car (2011 and 2023)

Fuel price context to 2011 AMAP revisions

As described above, the visibility of variations in fuel price, literally in big lights out in the street, is often people's main perception of changing motoring costs. Therefore, it is useful to consider the context of the fuel prices changes that led, in part, to the 2011 AMAP change. Figure 11 shows average weekly pump prices for petrol and diesel in the UK since 2003. Aside from a very sharp drop in 2008 related to the global financial crash, fuel prices had steadily increased over time, reaching an, at that time, all-time high in 2011 when the AMAP was revised. Pump prices had increased over 80% in the eight years prior to 2011. Subsequent to this though, pump prices plateaued until 2014 before falling dramatically. Even when they began to climb again in 2015, they didn't reach the high levels of 2011-14 until the 2020s.

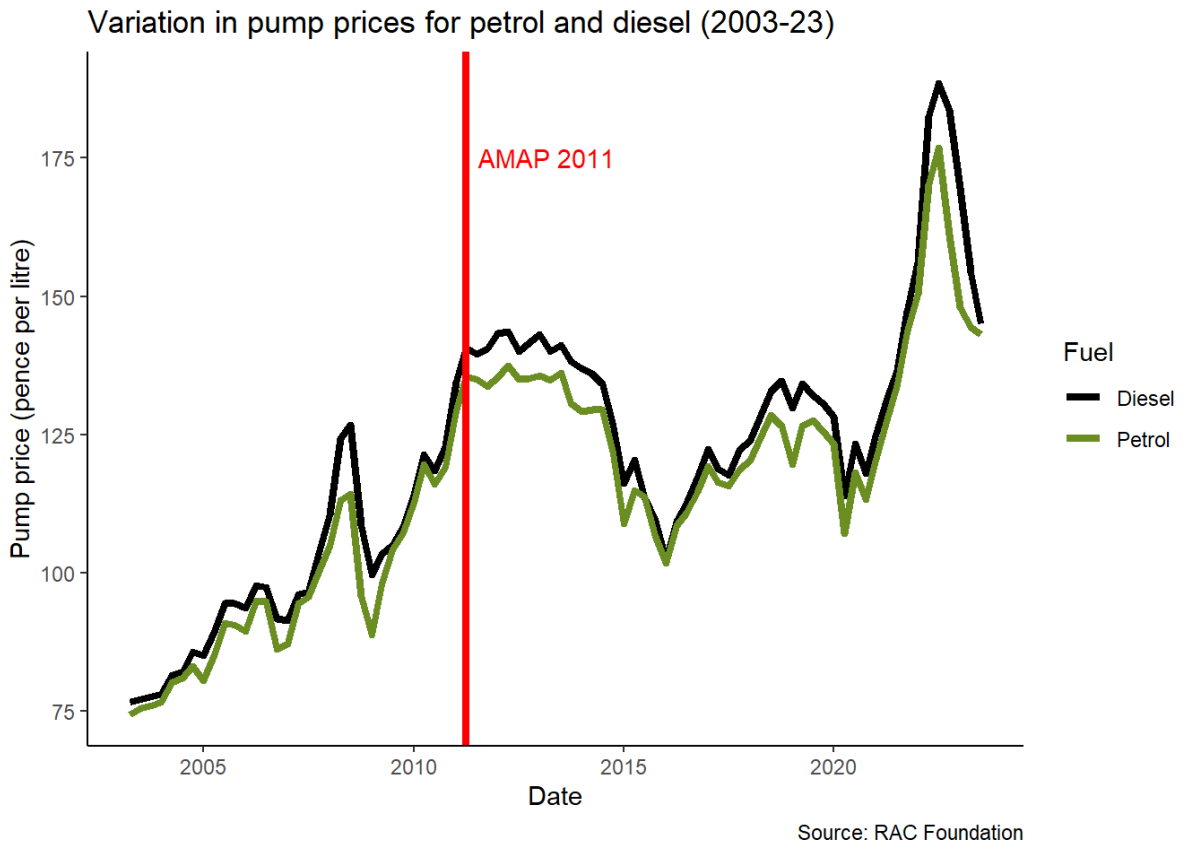

Figure 11: Variation in average pump prices for petrol and diesel (2003-23)

In this context, it can be better understood how the relatively small increase in the fuel element of the RPI basket over whole of the last 12 years (see Figure 9) sits alongside the other components.

Modelling changes

The following section sets out 3 approaches to calculating an updated AMAP rate for 2023.

Model 1 was designed as a simple method to allow AMAP rates to be regularly updated. In order to check the validity of this model, Models 2 and 3 were developed to validate and verify the outcome of Model 1. Models 2 and 3 are significantly more complex and have been presented here not as suggested alternatives to Model 1, but only as a way of testing the robustness of the main proposal.

Model 1: Adjust AMAP by RPI 'all motoring'

Under this model, the 2011 AMAP is adjusted to 2023 using the RPI components covering overall motoring costs (increase of 40.95%)

45p x 1.4095 = 63.4p

This method provides a very simple calculation of costs which, whilst accounting for changes in the four key components of motoring costs, relies on a figure that has already weighted them according to ONS processes (ONS, 2023).

As the ONS RPI figures are released monthly it would be possible to regularly update the AMAP figure annually, quarterly or even monthly. To adjust the AMAP rate more regularly would not necessarily lead to a loss of income for the Treasury at any given time.

Figure 12 shows a comparison of the flat 2011 AMAP rate against what the AMAP rate would have been if it had been adjusted monthly on the basis of the RPI data for all motoring costs. Wherever the blue line drops below the red (frequently up until around 2017) the AMAP rate was higher than it need be. The graph also shows how, since 2018, people who drive for work have had an increasing amount of their mileage costs above the AMAP rate.

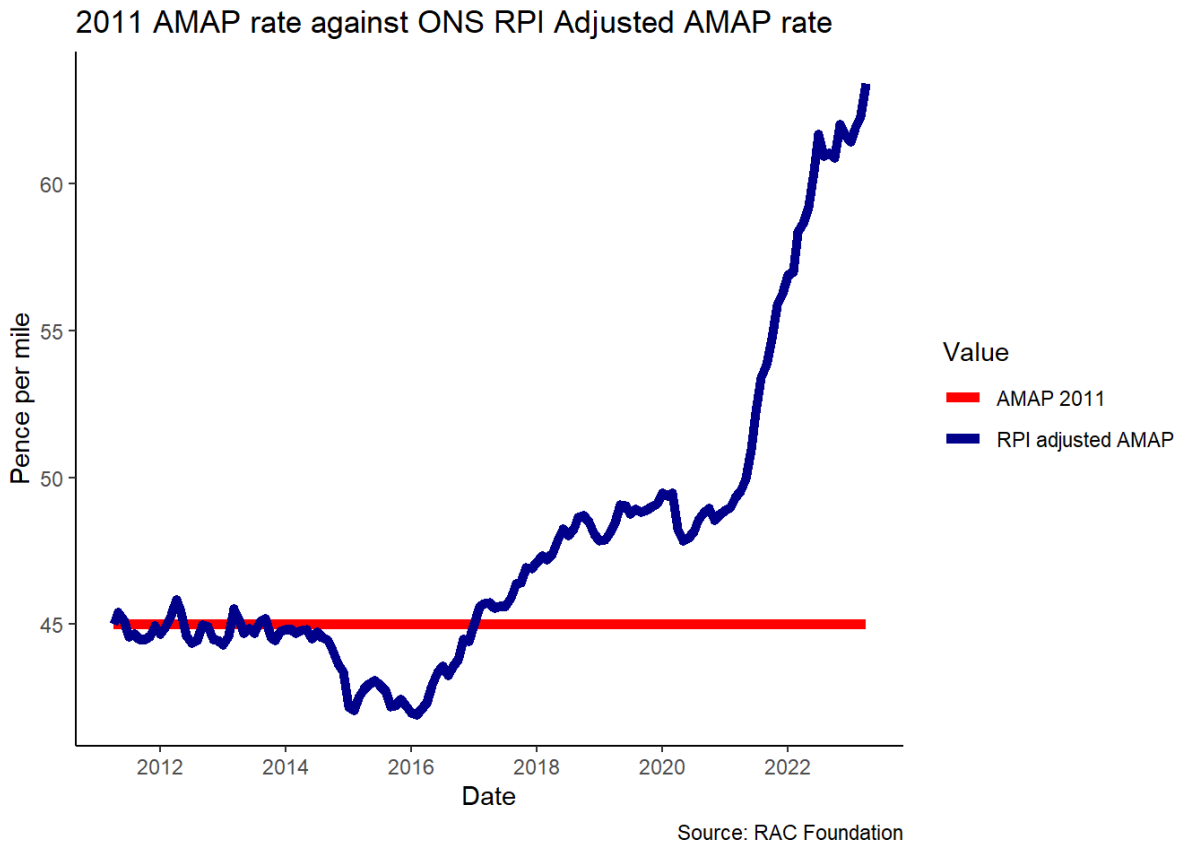

Figure 12: Variation in modelled AMAP rate compared to 2011 rate (2011-23)

In order to assess the robustness of this figure, two further approaches were developed that used breakdowns of motoring costs based, directly and indirectly, on average household expenditures from the ONS Living Costs and Food Survey.

Model 2: Forward Projection using LCFS 2011

The basic principle for this method is shown in Figure 13. Rather than taking the single 45p sum and projecting it forward, the various components of motoring for 2011, when the AMAP was revised, were estimated and then projected forward, according to the ONS RPI figures as above. *N.B. Both this model and Model 3 are based on the core assumption set out in the introduction. This is that the AMAP rates set in 2011 were appropriate, and specifically, that they were set above the level of average household motoring costs. This seems entirely reasonable as it is to be expected that households that own cars that are used for work purposes are likely to incur greater motoring costs. It should also be noted that the AMAP represents the maximum that can be claimed before tax and so should not be based on average costs.*

The per mile costs of motoring were calculated from the ONS Living Costs and Food Survey (LCFS) based on existing work by the RAC Foundation (2017)).

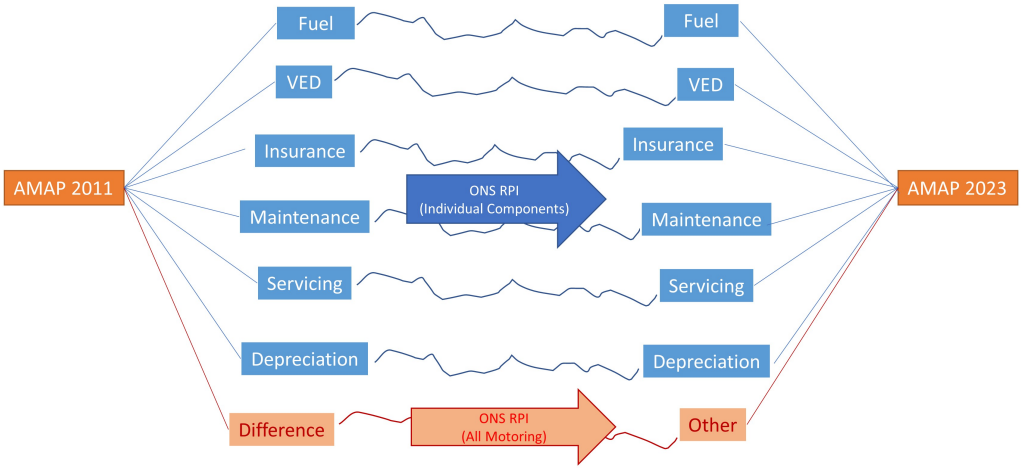

Figure 13: Schematic of process for Model 2

These provide annual expenditure on a range of motoring costs, which were then grouped into the following: Fuel, VED, Insurance, Maintenance and Servicing. The LCFS also provides a figure for expenditure on vehicle purchase. This was taken to represent what is considered as depreciation in the context of AMAPs, as depreciation is essentially just the purchase price minus the sales price spread over time.

The following additional assumptions were made:

1. As stated at the start of this section, the difference between the identified costs and the 2011 AMAP figure were deemed to have been a valid component of motoring costs in the 2011 AMAP calculation. However, as they were not attributable to a specific component, they were projected forward using the overall motoring cost RPI (40.95%).

2. LCFS costs are based on average weekly household costs, these were multiplied by 52 to get an annual sum.

3. Average car mileages for 2011 were derived from historical MOT data which provided a figure of 8,746 miles per car per year (for greater detail of methodology, see Carins et al., 2017).

4. The average household in the 2011 census had access to 1.168 cars/vans. Therefore the average annual household mileage was considered to be 8,746 * 1.168 = 10,180 miles.

Table 4 shows the modelled adjustments to each of the component motoring costs taken from LCFS 2011.

Table 4: Model 2: Forward projection of 2011 AMAP components

	Weekly Costs (LCFS 2011) (£)[1]	Annual Costs (£)	Cost Per Mile (2011) (p)[2]	Change (% increase) [3]	Cost Per Mile (2023) (p)
Fuel	24.9	1294.8	12.7	12.29	14.2
VED	2.92[4]	151.84	1.5	183.12	4.2
Insurance	9.4	488.8	4.8	183.12	13.5
Maintenance	2.9	150.8	1.5	48.17	2.2
Servicing	7	364	3.6	48.17	5.3
Purchase	18.4	956.8	9.4	16.04	10.9
Sum of Components			**33.4**		**50.3**
Difference with AMAP			11.6	40.95	16.4
				Total	**66.7**

[1] Taken from RACF calculations from Living Costs and Food Survey https://www.racfoundation.org/wp-content/uploads/2017/11/transport-expenditure-2010-v-2011-living-costs-and-food-survey.pdf

[2] Annual costs divided by average mileage per car 2011 (8,746 miles: RACF calculations from DVSA MOT data) multiplied by average number of cars per household (1.168: UK Census https://www.nomisweb.co.uk/census/2011/QS416EW/view/2092957703?rows=rural_urban&cols=cell)

[3] From ONS RPI Motoring Costs.

[4] Calculated from LCFS costs 2010-12 for VED for single car household * 1.168 (av. Cars per household) https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/adhocs/007738householdexpenditureonmotoringforhouseholdsowningacarbydisposableincomequintilegroupandbycountryandregionoftheuk2010to2012

Using this method for calculation, the sum of identifiable motoring expenditure components from the LCFS was 33.4p per mile. This left a difference between these and the AMAP of 11.6p. Forward projecting each component using the relevant ONS RPI figure resulted in an expenditure of 50.3p pence per mile. Adjusting the 11.6p AMAP difference by the overall cost of motoring RPI of 40.95% led to the projected difference being 16p and then to an overall projected AMAP figure of 66.7p per mile. Of particular note is the way that expenditure per mile on insurance has increased from 4.8p to 13.5p, making it the second largest component of expenditure after fuel purchases.

Model 3: Backward Projection from LCFS 2023

To further benchmark the predicted value, estimates of motoring expenditure for 2023 were used to estimate per mile expenditure. As the last available data from the LCFS were for 2021, estimates of motoring expenditure for 2023 were taken from Nimblefins (an insurance company) who had already forward projected the 2021 LCFS data and adjusted it to a per car basis ([Nimblefins, 2023])(https://www.nimblefins.co.uk/cheap-car-insurance/average-cost-run-car-uk).

These average annual expenditure per car was then converted to average per mile expenditure using 2022 annual car mileages calculated using DVSA MOT data (7,136 miles per year)

Then, as shown in Figure 14, each component of motoring expenditure was back projected to 2011 using the relevant ONS RPI figures. The difference between the sum of these back projections and the 2011 AMAP of 45p was then projected forwards using the All Motoring Costs figure from the RPI, and then added to the 2023 costs.

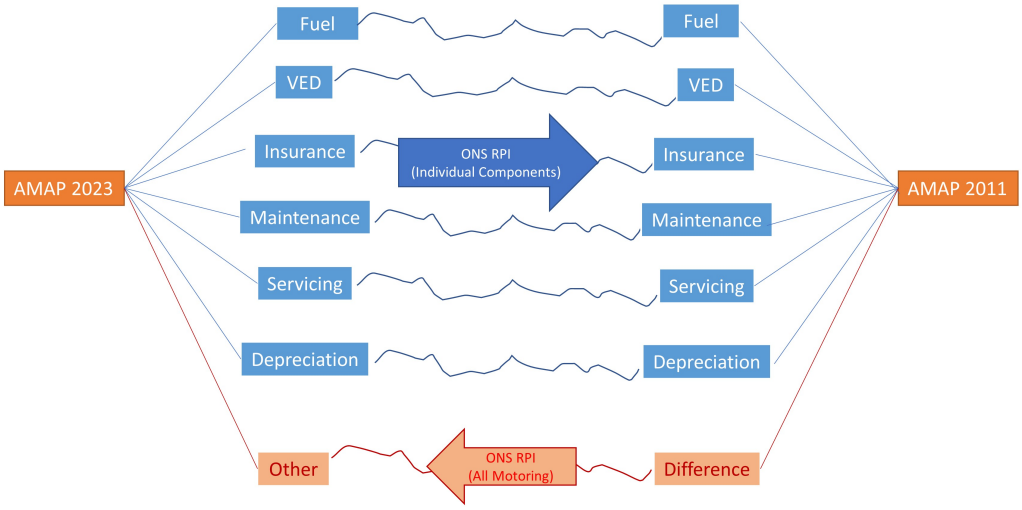

Figure 14: Schematic of process for Model 3

Table 5 shows the relevant figures for the backwards projection. Identifiable expenditure components from Nimblefins/LCFS totalled 49p per mile. When each of these were back projected to 2011 using the relevant RPI components, the total reduced to 37.5p per mile. The difference between this and the 2011 AMAP rate (7.5p) was then projected forward to 2023 using the All Motoring Costs RPI figure (40.95%) and added to the sum of the identifiable components. This resulted in a projected 2023 AMAP rate of 59.6p per mile.

Table 5: Model 3: Backward projection of 2023 AMAP components

	Annual Costs (Nimblefins 2023) (£) [1]	Cost Per Mile (2023)(p) [2]	Change (% increase) [3]	Cost Per Mile (2011) (p)
Fuel	1435	20.1	12.29	17.9
VED	141	2.0	183.12	0.7
Insurance	484	6.8	183.12	2.4
Maintenance[4]	58	0.8	48.17	0.5
Servicing	273	3.8	48.17	2.6
Purchase	1104	15.5	16.04	13.3
TOTAL per Mile		**49.0**		**37.5**
Difference		10.6	←40.95 ←	7.5
New Total		**59.6**		**45.0**

[1] Taken from Nimblefins 2023 projection of Living Costs and Food Survey https://www.nimblefins.co.uk/cheap-car-insurance/average-cost-run-car-uk.

[2] Annual costs divided by average mileage per car 2023 (7,136 miles: RACF calculations from DVSA MOT data).

[3] From ONS RPI Motoring Costs.

[4] Garage rent, other costs (excluding fines), car washing, etc.; Motoring organisation subscription (e.g. AA and RAC); Anti-freeze, battery water, cleaning materials.

Conclusion

Three separate methodologies based on government data (DVSA MOT tests, the "All Motoring" measure from RPI, and the Living Costs and Food Survey) have been used to estimate what an Approved Mileage Allowance Payment adjusted for 2023 might look like. We conclude that if the basic 2011 AMAP of 45p/mile can be taken to have been an appropriate level to set the rate then, adjusted for changes in motoring costs over the last 12 years, a rate of around 63-64p would be appropriate.

The 'simple' calculation methodology, which only uses monthly RPI values for motoring expenditure arrived at a figure of 63.4p. This was benchmarked by undertaking two more complex calculations to estimate values. These were both based (one directly and one indirectly) on the ONS Living Costs and Food Survey. One projected various components of the 2011 AMAP rate forward to 2023, the other estimated the cost of these components at the moment and backcast them to 2011 to compare them to the 2011 rate. These methods resulted in estimations of 66.7p and 59.7p per mile respectively, roughly equidistant above and below the result from the simple method.

Estimating average motoring costs is a difficult business, with hardly anyone actually likely to match an average profile. Therefore, any attempt to split overall motoring costs into different components will potentially multiply points for inaccuracies. However, the benchmarking methods indicate that the simple method produces a result which is not only in the same ballpark as the more complex methods, but lies almost exactly between them. It also highlights the need for the AMAP rate to be set on the basis of a ceiling rate, rather than basing it on the level of *average* motoring costs.

The work described here would allow for monthly recalculations of the AMAP rate. However, as one of the aims of the creation of AMAPs was to ease bureaucratic and administrative workloads this may be unecessarily frequent. As the advisory fuel rates for company cars are set on a quarterly basis, it may be the case that, as a very similar set of figures, the periodic revision of AMAPs could be merged with this work stream. An annual updating of the figures would also seem reasonable, and even updating at 5-year intervals would have helped people who drive at work to not be out of pocket.


RAC
Foundation