

22 June 2023

Ministry of Transport

Sent by email to: emissions@transport.govt.nz

SUBMISSION on 'Proposed Amendments to the Land Transport Rule: Vehicle Exhaust Emissions 2007' Consultation

1. Introduction

Thank you for the opportunity to make a submission on the Ministry of Transport's (Ministry) consultation on the proposed change to the Land Transport Rule: Vehicle Exhaust Emissions 2007 (Consultation). This submission is from Consumer NZ, an independent, non-profit organisation dedicated to championing and empowering consumers in Aotearoa. Consumer has a reputation for being fair, impartial, and providing comprehensive consumer information and advice.

Contact: Aneleise Gawn
Consumer NZ
PO Box 932
Wellington 6140
Phone: 04 384 7963
Email: aneleise@consumer.org.nz

2. General comments on the Consultation

Air pollution from motor vehicle emissions causes significant harm to the health of New Zealanders, and to our environment. We therefore strongly support any action to reduce these emissions.

In particular, we support a shift to Euro 6/VI as this:

- will significantly reduce pollutants and introduce more accurate testing practices.
- will bring New Zealand's emission's standards into line with other developed countries.
- is expected to save \$6 billion in social costs to 2050 in New Zealand.

Given voluntary uptake of Euro 6/VI is low, we agree legislative changes are required.

We also agree the timing of these changes is critical. If changes are not implemented quickly enough, the health of New Zealanders will continue to be harmed. However, if they are introduced too quickly, consumers may not have adequate access to vehicles at affordable prices.

We note the Ministry of Transport will monitor the effect of the introduction of Euro 6/VI on prices. We support this happening as we are conscious that these standards may have some impact on the prices consumers pay for both new and used vehicles.

Our views on proposed timeframes in the Consultation are as follows.

Used light vehicles (petrol and diesel)

We support the introduction of Euro 5/V by 1 February 2024 and Euro 6/VI by 1 February 2026 for used light vehicles.

New light vehicles (petrol and diesel)

We consider Euro 6/VI should be introduced for new light vehicles as soon as possible. Given most of the global automotive market has already adopted Euro 6/VI we don't think its introduction would significantly impede vehicle distributors in Aotearoa. Also, given China, Europe and the United States are already starting to move onto Euro 7/VII, delaying action to meet Euro 6/VI would mean we are falling further behind other developed countries.

Used heavy vehicles

We support the introduction of Euro 5/V by 1 February 2024 and Euro 6/VI-C by 1 November 2025 for used heavy vehicles.

New heavy vehicles

For the reasons stated above for new light vehicles, we support introducing Euro 6/VI-C for new heavy vehicles and existing models of new vehicles earlier than the proposed timeframes in the Consultation.

Mopeds and motorcycles

Given there is no Euro 6/VI standard for mopeds and motorcycles, we support the introduction of an emissions standard for these. We also

support the proposed timeframes in the Consultation for moving to Euro 4/IV and 5/V.

Used light disability vehicles

We support used disability vehicles being required to comply with Euro 5/V by 1 February 2024 and Euro 6/VI-D by 1 January 2028.

Euro 7/VII

Once a decision has been made about the implementation timeframes for Euro 6/VI, we encourage the Ministry to start planning for the adoption of Euro 7/VII.

Thank you for the opportunity to provide comment.

ENDS