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Listed below are the most commonly used grounds from the OIA.

<u>Section</u>	<u>Description of ground</u>
6(a)	as release would be likely to prejudice the security or defence of New Zealand or the international relations of the New Zealand Government
6(b)	as release would be likely to prejudice the entrusting of information to the Government of New Zealand on a basis of confidence by <ul style="list-style-type: none"> (i) the Government of any other country or any agency of such a Government; or (ii) any international organisation
6(c)	prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial
9(2)(a)	to protect the privacy of natural persons
9(2)(b)(ii)	to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information
9(2)(ba)(i)	to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public
9(2)(ba)(ii)	to protect information which is subject to an obligation of confidence or which any person has been or could be compelled to provide under the authority of any enactment, where the making available of the information would be likely otherwise to damage the public interest
9(2)(f)(ii)	to maintain the constitutional conventions for the time being which protect collective and individual ministerial responsibility
9(2)(f)(iv)	to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials
9(2)(g)(i)	to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty
9(2)(h)	to maintain legal professional privilege
9(2)(i)	to enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities
9(2)(j)	to enable a Minister of the Crown or any public service agency or organisation holding the information to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations)



16 February 2023

OC230004

Hon Michael Wood
Minister of Transport

Action required by:
Tuesday, 21 February 2023

DELEGATED DECISIONS ON THE CLEAN CAR UPGRADE FOR THE TRIAL

Purpose

Seeking decisions on key design elements for the April 2023 trial of the Clean Car Upgrade, which were delegated to you by Cabinet.

Key points

- In November 2022 Cabinet agreed to proceed with a trial of the Clean Car Upgrade commencing in at least one location by April 2023.
- Cabinet also agreed to delegate decisions on specific design elements of the Clean Car Upgrade trial to you. Te Manatū Waka and Waka Kotahi have developed advice for the delegated decisions that need to be made before the start of the April 2023 trial.
- Waka Kotahi has advised that the location for the April 2023 Clean Car Upgrade trial will be Auckland.
- Waka Kotahi continues to work with the Tairāwhiti region to determine the viability of the wider region (which includes all five wards of Gisborne district, including Gisborne City) as a trial location. Engagement has been impeded by significant weather events in the region. More work is required, but the Tairāwhiti region is likely to be the last trial to commence if a Clean Car Upgrade trial proceeds in this location.

Element	Recommendation												
Trial length	15 months from the start of the last trial (commencing in July 2023).												
Warrant of Fitness (WoF) and scrapped vehicle eligibility	<p>We propose that vehicles continue to be eligible for the scheme if they have been made inoperable within the last eight months, but had a WoF at the time of the event that made them inoperable. This ensures those impacted by the floods in Auckland can still participate in the Upgrade. This would be done through the proposed definition of “drivable”.</p> <p>Allowing inoperable vehicles to enter the trial impacts the intent and evaluation of the trial in reducing emissions as vehicles that are already off the road become eligible for the scheme. However, the approach would be limited and we consider it would provide an additional benefit to those on lower incomes.</p> <p>More work is required to determine whether it is possible to remove the WoF requirement in one location of the trial to allow for vehicles that are in use, but that do not have a WoF. More information will be provided to you as we work through this issue.</p>												
Individual income eligibility	<p>We propose individual income caps are increased to ensure the scheme is targeted to low to medium income earners and single parents are not unfairly disadvantaged. This is in line with the current cost of living payment threshold but is higher than the median individual income earned in 2022.</p> <table border="1" data-bbox="448 1249 943 1503"> <thead> <tr> <th>Participant</th> <th>Proposed</th> </tr> </thead> <tbody> <tr> <td>Individual</td> <td>\$70,000</td> </tr> <tr> <td>+ 1 Child</td> <td>\$80,517</td> </tr> <tr> <td>+ 2 Children</td> <td>\$91,034</td> </tr> <tr> <td>+ 3 Children</td> <td>\$101,551</td> </tr> <tr> <td>+ 4 Children</td> <td>\$112,068</td> </tr> </tbody> </table> <p>Note that the income cap for applicants living with a partner is higher than the individual income cap. This creates a risk of disadvantaging those who are single, and could possibly contribute to inequities. We do not have delegation from Cabinet to change this setting.</p>	Participant	Proposed	Individual	\$70,000	+ 1 Child	\$80,517	+ 2 Children	\$91,034	+ 3 Children	\$101,551	+ 4 Children	\$112,068
Participant	Proposed												
Individual	\$70,000												
+ 1 Child	\$80,517												
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+ 3 Children	\$101,551												
+ 4 Children	\$112,068												

- We propose that eligibility of higher priced vehicles under limited circumstances is not progressed for the initial trial launch in April 2023 as more work is required. More information will be provided to you as we work through this issue.
- Waka Kotahi also advises that the delegated decision for multi-generational household eligibility is no longer required. Analysis has indicated that multi-generational households will be eligible for the Clean Car Upgrade as only an individual or couple’s income will be tested, not the total household income.

- We also propose that you allow grants provided under the Clean Car Upgrade trial to be used to enter the Social Leasing Scheme trials if trial co-locations are established.
- Further advice for the July 2023 trials in Christchurch and either Gisborne City or the wider Tairāwhiti region (pending confirmation), and advice on the subsequent launch will be provided in June 2023.

Recommendations

We recommend you:

- 1 **note** Cabinet delegated to you decisions for the Clean Car Upgrade trial on the trial location, trial length, Warrant of Fitness and scrapped vehicle eligibility, individual income eligibility, multi-generational household eligibility, and eligibility of higher priced vehicles.
- 2 **note** that Auckland will be the location of the first trial launched for the Clean Car Upgrade, to commence in April 2023
- 3 **note** more work is required to confirm the wider Tairāwhiti region (which includes all five wards of Gisborne district, including Gisborne City) as a trial location
- 4 **agree** that trials for Clean Car Upgrade run for 15 months from the start of the last trial (due to start no later than July 2023). Yes / No
- 5 **note** that if you agree to recommendation 4, the Clean Car Upgrade Trial will have the following timeline:
 - trials in all locations start no later than July 2023, with the first trial commencing in Auckland in April 2023, and all trials ending by October 2024
 - evaluation of the trials, including modelling of potential emissions impact, will be completed by April 2025
 - a report back to Cabinet on the outcome of evaluation and future of the Clean Car Upgrade will be prepared for June 2025.
- 6 **agree** for the April 2023 trial in Auckland to include those impacted by the floods (and other events that leave their vehicle inoperable) but would otherwise be eligible for the Clean Car Upgrade, by defining drivable as vehicles that have:
 - a current WoF and annual vehicle licence, or ones that have expired by no more than 28 days; or
 - within the last eight months been written off or are inoperable but had a WoF at the time of the event that damaged them and made them inoperable.
 Yes / No
- 7 **note** that agreement to recommendation 6 impacts the intent and evaluation of the trial in reducing emissions as vehicles that are already off the road become eligible for the scheme, however, the approach would be limited, and we consider it would provide an additional benefit to those on lower incomes.
- 8 **note** Waka Kotahi is continuing to work on the definition of drivability and may propose to modify it ahead of the remaining two trials.

- 9 **agree** to raise the income threshold for individuals to \$70,000, in line with the cost-of-living payment threshold, including \$10,517 per child, for the Clean Car Upgrade trial. Yes / No
- 10 **note** that the current higher income threshold for couples creates a risk in the scheme and disadvantages individuals, but officials will monitor this risk as part of the trials.
- 11 **note** that more work is required on the following delegated decisions for the remaining trials to be launched in July 2023:
- Warrant of Fitness and scrapped vehicle eligibility (for vehicles that are in regular use, but without a Warrant of Fitness)
 - eligibility of higher priced vehicles under limited circumstances.
- 12 **note** that the delegated decision for multi-generational household eligibility is no longer required as analysis has indicated that multi-generational households will continue to be eligible for the Clean Car Upgrade.
- 13 **agree** to allowing the use of grants provided under the Clean Car Upgrade trial to enter the Social Leasing Scheme trial, where co-location of trials is established. Yes / No



Matt Skinner
**Manager, Environment and Emissions
 Policy Design**
 16 / 02 / 2023

Hon Michael Wood
Minister of Transport
 / /

- Minister's office to complete:**
- Approved Declined
- Seen by Minister Not seen by Minister
- Overtaken by events

Comments

Contacts

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DELEGATED DECISIONS ON THE CLEAN CAR UPGRADE FOR THE TRIAL

Cabinet delegated key decisions on the Clean Car Upgrade

- 1 In November, Cabinet agreed to the design detail of the Clean Car Upgrade and delegated decisions to you (ENV-22-MIN-0031 refers) for the following specific design elements:
 - 1.1 trial length
 - 1.2 warrant of fitness and scrapped vehicle eligibility
 - 1.3 individual income eligibility
 - 1.4 multi-generational household eligibility
 - 1.5 eligibility of higher-priced vehicles under limited circumstances
- 2 In making these delegated decisions, Cabinet agreed that you would need to be satisfied on the following principles before making your decisions:
 - 2.1 any changes are kept to the minimum necessary to ensure successful operation of trials of the initiative.
 - 2.2 any changes to schemes would need to be agreed ahead of the launch of the scheme.
 - 2.3 the proposed change continues to meet the intent of the scheme (ENV-22-MIN-0031 refers): *To support transition to low emissions transport for New Zealanders with lower incomes by reducing financial pressures, ensure all New Zealanders benefit from the transition to net-zero emissions, accelerate CO2 emissions reduction, and improve vehicle safety.*
- 3 Waka Kotahi has also been continuing to work to identify whether the wider Tairāwhiti region would be a viable option for a trial.

The location for the April 2023 Clean Car Upgrade trial will be Auckland

- 3 Waka Kotahi has advised that based on current engagement feedback, an Auckland trial location would be the fastest to set up out of all the Clean Car Upgrade trial locations. For this reason, we propose that Auckland be the first trial location to be established for the April 2023 start. Auckland is defined as the 13 wards making up Auckland Council.
- 4 Waka Kotahi is working with stakeholders in Auckland to see if the recent floods will have any impact on the delivery timetable and launch for the April 2023 trial. We are currently not anticipating any delays unless community providers need to divert resource to help with the clean-up.

- 5 Christchurch is expected to be the second trial established for the Clean Car Upgrade, but more engagement with the local iwi is required.
- 6 Waka Kotahi continues to work with the Tairāwhiti region to determine the viability of the wider region to be a trial location. We are defining the wider Tairāwhiti region as the five wards of Gisborne district, including Gisborne City.
- 7 Engagement has been impeded by significant weather events in the region. More work is required, but the Tairāwhiti region is likely to be the last trial to commence if a Clean Car Upgrade trial proceeds in this location.
- 8 Waka Kotahi has confirmed that the communities in the Tairāwhiti region are highly interested in being involved, but it is yet to be determined if the Clean Car Upgrade, Social Leasing Scheme or a co-location of both would be the best option for this region.
- 9 Gisborne City will continue to be a trial location, as has been publicly communicated in the Ministerial Direction¹, however, the wider Tairāwhiti region continues to be explored for viability. This is mainly due to the availability of appropriate vehicles for the Tairāwhiti region.

The floods in Auckland may affect drivability of eligible vehicles

- 10 In August 2022 [ENV-22-MIN-0031 refers], Cabinet agreed that to be eligible for scrapping, vehicles must be **drivable** and have:
 - 10.1 emissions at, or higher than, the fleet average.
 - 10.2 a current warrant of fitness (WoF) and annual vehicle licence, or ones that have expired by no more than 28 days.(In November 2022, this was further refined with requirements added for how long a vehicle must have been owned for and how old the vehicle must be.)
- 11 Waka Kotahi has been working through a proposed definition of “drivable” and how this would impact on cars that have been damaged in the Auckland floods.
- 12 The drivability assessment was introduced as a feature of the California scheme, which the Clean Car Upgrade is based on and was intended to ensure that vehicles were in use when traded in as part of the Upgrade. However, California does not have a WoF requirement for vehicles, so drivability was a necessary feature of their scheme. In New Zealand, Waka Kotahi considers it more appropriate to rely on the WoF to ensure drivability.
- 13 We recognise that some vehicles damaged in the recent Auckland weather events may have had their drivability impacted and the owners may choose not to renew their WoF as a result. Similarly, some people may have a vehicle damaged in a crash making it undrivable, and as a result they may not renew their WoF. We consider these groups should be treated the same for the purposes of defining drivability. We propose that inoperable vehicles that have recently been in use and have a WoF

¹ [New Zealand Transport Agency \(Trial Clean Car Upgrade Scheme\) Direction 2022](#)

history to confirm this are eligible for the trial, even though those vehicles may not have a current WoF at the time of entering the trial.

- 14 To include people impacted by the recent weather or other events that would otherwise be ineligible for the Clean Car Upgrade, we propose “drivable” includes vehicles that:
 - 14.1 Have a current WoF and annual vehicle licence, or ones that have expired by no more than 28 days; or
 - 14.2 have within the last eight months been written off or deemed inoperable but had a current WoF and annual vehicle licence at the time of the event that damaged them and made them inoperable.
- 15 The eight-month period provides sufficient time after the Auckland weather events (in late January to mid February 2023) for the trial to commence and people to decide to participate in the Upgrade.
- 16 This definition would apply for the April 2023 trial launch in Auckland, but may be modified prior to the launch of the remaining two trials.
- 17 This approach would ensure that people in these circumstances looking to replace their current vehicles can upgrade to a low-emission and safer vehicle. However, it would also impact the intent and evaluation of the trial in reducing emissions, as vehicles that are already off the road would become eligible for the scheme.
- 18 Participants entering the scheme may already have been considering replacing their vehicle with a low-emission alternative. However, participation in the scheme creates certainty that the user will replace their existing vehicle with a low-emission alternative, rather than purchasing another older high-emitting vehicle.
- 19 Given the number of vehicles damaged during the Auckland weather events there could be an increased level of interest in participation in the scheme in Auckland. This potential inflated level of interest will need to be considered when evaluating the Clean Car Upgrade trial.
- 20 Note that you also have delegated decision-making power on the WoF eligibility for scrapped vehicles under the Clean Car Upgrade. This is discussed in paragraphs 34-37 below.

Length of Trials for the Clean Car Upgrade is recommended to be 15 months from the start of the last trial

- 21 In August 2022, Cabinet agreed to a trial with a report-back due in April 2024. This is would have required a trial length of 6-9 months. However, preliminary community engagement suggested that a trial this short would not be welcomed by many communities and could be problematic for delivery partners
- 22 In November 2022, Cabinet agreed to delegate the decision to you about whether to extend the trial length up to a maximum of 15 months after all trials are underway. Extending the trials to the maximum length would result in the following timeline:

- trials must start no later than July 2023 (with the first trial starting in April 2023) and for a maximum of 15 months.
- end of all trials in October 2024.
- evaluation and modelling of potential emissions impact completion in April 2025
- report back to Cabinet on the outcome of evaluation and future of the Clean Car Upgrade in June 2025.

23 Waka Kotahi has advised that it has sufficient feedback from potential partners to indicate that a longer time frame is preferred to build confidence, momentum and uptake. For this reason, we recommend that the trial be 15 months from the start of the last trial.

24 This longer time period also provides more time to test and refine some of the processes for the trial.

We recommend that the income threshold for individuals is increased to \$70,000, with an additional \$10,517 per child

25 In August 2022, Cabinet agreed to income thresholds for participant eligibility for the Clean Car Upgrade that were aligned to median income. These income thresholds were adopted to ensure the trial complied with the programme intent of supporting individuals and households earning low to moderate incomes. Cabinet also noted that the thresholds would be recalibrated annually as the median incomes changed.

26 Preliminary engagement by Waka Kotahi suggested concern that this income limit could restrict participation in the trial. Potential participants on a lower income may not be in a financial position to purchase a suitable vehicle under this scheme and they may not have alternate transport choices.

27 Cabinet agreed in November 2022 that you would decide whether to adjust the individual income threshold “to ensure the right balance of accessibility of the trial for those who can afford to upgrade their vehicles without creating financial hardship”.

28 Based on their engagement, Waka Kotahi has proposed a \$70,000 cap for individual incomes. Te Manatū Waka analysis of the 2022 median income for individuals shows that \$61,828 is the median income. Te Manatū Waka support the Waka Kotahi proposal to increase the individual income cap to \$70,000 but note that this increased income cap would extend the scheme to those outside “middle to low incomes”. However, the proposed individual income threshold is in line with the current cost of living payment threshold.

29 The current and proposed income thresholds are noted in the table below.

Participant	Current	Proposed
Individual	\$56,836	\$70,000
+ 1 Child	\$67,353	\$80,517
+ 2 Children	\$77,870	\$91,034
+ 3 Children	\$88,387	\$101,551
+ 4 Children	\$98,904	\$112,068

Participant	Current	Proposed
Couple²	\$97,760	
+ 1 Child	\$108,277	
+ 2 Children	\$118,794	
+ 3 Children	\$129,311	
+ 4 Children	\$139,828	

The current higher income threshold for couples creates a risk in the scheme and disadvantages individuals

- 25 Cabinet has agreed that applicants living with their spouse, or civil union, or de facto partner have a higher income cap for couples. This higher income cap was intended to ensure that those in a relationship did not take advantage of the scheme by only declaring one partner's income.
- 30 However, the proposed higher income cap provides an advantage to those who have two incomes or a single higher income. It also creates a risk that individuals may declare they have a partner with zero income to be eligible for the higher income cap.
- 27 Officials considered recommending that the income cap for couples be removed and only the individual income cap be applied for both individuals and couples. However, the current settings have been agreed to by Cabinet, with only limited delegation to you specific to individual income.
- 28 We consider that this risk should be noted, but as this is a trial, we can test the risk of the higher income threshold for couples to identify if it becomes an issue and modify accordingly for any national rollout of the Clean Car Upgrade.

Waka Kotahi have advised that they no longer require a decision on multi-generational household eligibility as they are currently included in the scheme

- 31 In November 2022, Cabinet agreed to delegate decisions to you on multi-generational household eligibility. This was to determine if a higher income threshold would be required for multi-generational households, to ensure they are eligible under the scheme.
- 32 Waka Kotahi has advised that it no longer requires this decision as the income thresholds relate to individuals, couples and their dependent children – not households. This means that individuals and couples living in multi-generational households will not be excluded from accessing the scheme, provided all other eligibility requirements are met.
- 33 During the trial, Waka Kotahi aims to get a better understanding of the transport needs of multi-generational households to inform any future roll out. For example, these households may benefit from being able to access more than one vehicle.

² Applicants living with their spouse, or civil union, or de facto partner.

Waka Kotahi needs more time to explore some delegated decisions

Warrant of Fitness and scrapped vehicle eligibility

- 34 In August, Cabinet agreed that a vehicle must have a Warrant of Fitness and annual registration, or one that has expired by no more than 28 days to be eligible for scrapping. This requirement was adopted to protect against the risk of end-of-life vehicles being sourced and accepted into the trial scheme.
- 35 Preliminary community engagement shows a concern that the Warrant of Fitness and annual registration requirement could be a barrier to participation, particularly in the Tairāwhiti region, where suggestion has been made that some people routinely drive unwarranted and unregistered vehicles.
- 36 In November 2022, Cabinet delegated to you the decision of whether to waive the Warrant of Fitness and annual licence requirements in one trial region.
- 37 Waka Kotahi needs more time to explore this issue. Waka Kotahi advise that extending eligibility to vehicles that do not have a Warrant of Fitness meets scheme intent for removing older high emitting vehicles from the fleet, and recognises that people driving unwarranted vehicles may be most in need of support. However, there are a number of issues to be worked through across government. Some of these issues are included below.
- 37.1 The scale of the need is unknown, and it is unclear whether the Clean Car Upgrade would be a good fit for the people and vehicles targeted or whether Social Leasing would be more appropriate
- 37.2 It is illegal to drive a vehicle without a Warrant of Fitness, unless it is safe to drive, and it is being taken somewhere for repair or to renew the Warrant of Fitness.
- 37.3 There appear to be no legally prescribed amnesty provisions for issues related to the Warrant of Fitness and no suitable exemption provisions.
- 37.4 Allowing, or directly or indirectly encouraging an unwarranted vehicle to be driven would raise significant safety and reputational risks as Waka Kotahi is the road safety regulator, and would have no assurance that a vehicle was safe to be driven.
- 37.5 An ad hoc amnesty could be costly to implement and would require the buy-in of multiple stakeholders³.

A separate higher price cap to support the purchase of a larger vehicle for use by multiple households

- 38 In April, Cabinet agreed to a price cap of \$35,000 on replacement vehicles. This price cap was intended to reduce the appeal of the upgrade to New Zealanders on a high income. It also reduces the risk of participants purchasing financially unsustainable vehicles.

³ NZ Police, the Ministry of Transport and the Road Controlling Authority

- 39 The April Cabinet paper noted that this price limit largely removes new medium to large sized vehicles from the scheme. However, the limit was high enough to allow the purchase of quality used-vehicles.
- 40 In April, Cabinet agreed to delegate to you the authority “to determine if a separate price cap should be allowed when multiple households scrap a vehicle and pool funding.”
- 41 Preliminary engagement by Waka Kotahi suggested some interest in multiple households scrapping vehicles then pooling funding to purchase a single larger replacement vehicle. However, Waka Kotahi needs more time to explore this issue.
- 42 Waka Kotahi also noted that some participants may require four-wheel-drive vehicles to drive safely on the road in their area and multi-generational households may also require larger vehicles. However, Te Manatū Waka notes that your current delegated authority is limited to setting a new price cap where multiple households pool funding and replace a vehicle, so Cabinet decision may be required to make changes to vehicle eligibility for multi-generational households or communities with different driving needs.
- 43 Waka Kotahi will continue to investigate the price and availability of larger vehicles, that would meet the requirements of the trial and these communities, and understand the potential demand for them.

Permitting the use of grants provided under the Clean Car Upgrade trial to enter the Social Leasing Scheme

- 44 In August 2022, Cabinet agreed that the low-emission alternatives subsidised by the Clean Car Upgrade be the use of public transport, the purchase of bikes and e-bikes, and low-emission services available in the trial locations that Waka Kotahi considers reputable, *such as low-emission car share and lease services* (ENV-22-MIN-0031 refers).
- 45 At that time, Cabinet agreed in principle that the grant towards the purchase of an Electric Vehicle or low-emission alternatives would be \$12,075. This was confirmed by Cabinet in November 2022 (ENV-22-MIN-0050 refers).
- 46 Waka Kotahi is proposing that grants from the Clean Car Upgrade can be used to enter the Social Leasing Scheme as a lease option, in locations where trials for the two schemes overlap. Te Manatū Waka supports this proposal as it would put the needs of the community first, however, it would complicate evaluation and could reduce the number of individuals and whānau able to access support from these schemes.
- 47 Waka Kotahi considers that allowing Clean Car Upgrade grants to be used to enter Social Leasing Scheme trials is appropriate and consistent with other Government support services provided. The Government currently offers several subsidies to individuals and families (such as public transport, reduced fuel tax, working for families, cost of living payment) and does not restrict people to only accessing one at a time.

48 The advantages to permitting the use of Upgrade grants in the Social Leasing Scheme are noted below.

48.1 **Provides an affordable pathway:** Participants are provided a pathway to access a low emission and safe vehicle (for those with an eligible vehicle to scrap), who may otherwise not have been able to afford to enter either the Clean Car Upgrade or Social Leasing Schemes.

48.1.1 Weekly participant costs for social leasing are expected to be \$95 per week or more. Although it is noted that initial feedback has indicated this cost may be unaffordable for many potential participants. At a rate of \$95, the Clean Car Upgrade grant would cover 2.4 years of a lease under social leasing. This amount of cost savings over a multi-year period could have a significant impact on participants' financial wellbeing.

48.2 **Offering more options for participants:** Social leasing provides an additional option for a subscription-based transport alternative that may be of interest to some participants in the Clean Car Upgrade.

49 Concerns associated with permitting the use of grants in the social leasing scheme are noted below.

49.1 **Reducing the number of people who support is available for:** The objective of both programmes is to support as many households as possible as part of an equitable transition. Since resources for both programmes are limited, allowing some participants to access both programs could prevent others from participating. However, this risk is limited and Waka Kotahi does not expect the trials to exhaust the allocated funding. It is also anticipated this risk would be off-set by the improved access of the schemes to those who need it most and may otherwise find either scheme unaffordable.

49.2 **Complicating evaluation:** It may be difficult to evaluate the effectiveness of the individual Clean Car Upgrade and Social Leasing programmes if the two have been linked during trials. However, this risk can be mitigated by good record-keeping which would allow evaluation of those who participated in both the Clean Car Upgrade and Social Leasing Scheme to be conducted separately to the those who participated in just one scheme.

Next steps

50 The remaining Clean Car Upgrade trials are due to commence in July 2023. In June 2023, Te Manatū Waka and Waka Kotahi will provide you advice on the decisions required ahead of the remaining trials.

51 Waka Kotahi is developing a communications plan for the launch of the Auckland trial. This includes Waka Kotahi working with delivery partners to use well-established channels and networks to ensure a broad reach. Waka Kotahi will liaise with Te Manatū Waka and your office to ensure communication material is aligned and release of information is coordinated.