

## Clean car submission

I would like to submit my general support for this proposal, with some comments.

Given the clear urgency and severe impact of Climate change I believe the policy while very positive should be more aggressive both in timescale and scope.

a) At present the suggested proposal only really benefits those on higher incomes who can afford the substantial cost of a new(ish) no or low emissions vehicle. Today and even in 2 years time most of the then 3 year old zero emissions vehicles will be in the \$30,000NZD plus price bracket well above where many buyers can go. Therefore to be of real benefit both in emissions and economics the 3 year cutoff should be extended to say 4 or better 5 years for a zero only (not low) emissions vehicle. This approach would encompass many BEV (battery electric vehicles) of around \$20k value where the savings could even then be self-financing.

Such an extension would open the market for BEV cars down into the main buying brackets thus including a larger percentage of owners and especially those on lower incomes. Bearing in mind such cars in the price bracket as the Gen 1 or gen 2 Nissan leafs are still zero emission so worth bringing into NZ.

b) The removal of RUC exemption is a hit for both existing owners and any lower income households considering purchasing a BEV. My suggestion is that when the externalities are considered such as public health impacts of ICEs that the RUC a BEV pays should be substantially lower than the present smallest diesel class.

c) The present proposal on the penalisation for large SUV/ICE is too low as is discount on BEV. The additional cost needs to be doubled for a large emission ICE to allow the time bracket for BEVs to be extended to 4 or better 5 years.

d) "Therefore, the government has determined that only low emission vehicles below \$80,000 price (including GST) will attract a discount. All high emission vehicles will attract a fee irrespective of their selling price." This is set too high for an EV. In countries outside of NZ many BEVs are far cheaper than in NZ, hence a ceiling of \$70kNZD will help remove price gouging or even price increases. It is possible that larger BEVs will not be imported but such cars are not of substantial benefit to NZ's carbon footprint per vehicle, ie better the discount 3 or 4 low cost BEVs than 1 large BEV.

e) "Within OECD countries, the only countries without a vehicle fuel efficiency standard (VFES) are Russia, Australia and New Zealand." this should be brought in in as short a time frame as possible ie where technology exists already to meet a standard enable it in NZ as soon as possible as right now NZ can be sent older models that have not sold elsewhere or may not be even saleable any more.