

**SUBMISSION to the Ministry of Transport
on the
CLEAN CAR (FEEBATE) SCHEME**

From:

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PUBLIC INFORMATION STATEMENT:

We are happy that our submission be included in reports available to the public.

INFORMATION ABOUT NELSUST:

We have been an incorporated society since 2002, with currently 300 members. Although we have wider sustainability interests, our focus is on transport strategy.

1.0 INTRODUCTION: We congratulate you on the production of this document. We acknowledge the significant amount of work that has gone into getting it to this point. We are writing an email submission, as the online one does not provide a place to suggest changes or differences to set questions. We request a number of changes to the draft document, in particular we would like the scheme to include e-bike rebates as these often become motor vehicle replacements for a surprising number of trips, once people have them. For the Clean Car Standard, we ask for weight based bands to be replaced by vehicle type/accommodation provided bands. And we request the scheme be implemented sooner with stricter emission standards and fee caps based on a % of vehicle cost rather than flat low cap rates. The reason for this is that we are in a Climate Emergency and emissions from cars* have been our biggest growth in emissions - we need to move fast and furious on this!

*"Cars" in this sense includes double cab utes and off road vehicles that are used primarily as runabouts, many of which can scarcely be classed as "light" motor vehicles.

2.0 CHANGES REQUESTED:

(Note: if we don't comment it can be assumed we agree with the proposals)

2.1 Include E-bikes in scheme. Many people are finding they are surprisingly using e-bikes as a car replacement for many trips once they have them. This whole Clean Car scheme's purpose is to rapidly reduce fossil fuel light vehicle use, where the price of low or zero emission vehicles is a barrier to uptake. This is exactly the situation with e-bikes. Many people balk at spending a number of thousands on a bike, even if it is an e-bike. A thousand dollar rebate on these would make a huge difference to uptake of these, whereas a thousand dollar rebate on a \$74,000 Hyundai Kona electric car makes comparatively little difference.

We would make the point here that e-bikes effectively flatten the terrain, so people living on hills where ordinary cycle commuting is really only for the committed, can have a \$4000 electric vehicle option for commuting and general running around. E-bikes of course have two major co-benefits that electric cars do not have - you are still getting some exercise (some say just as much exercise as you tend to go further and more often than on an ordinary bike), and they take up a tenth of the room a car takes up. Nelson Central CBD is 44% roads, car parks and car yards; e-bike commuting can free up land currently dedicated to space-hogging cars, utes and SUVs.

We ask the scheme to be modified to include a \$1000 rebate on e-bikes. (See below for where the extra money required would come from)

2.2 Euro Emission Standard is what the Feebate bands should be centred on. This is a Climate Crisis; we need to go at this like our house is on fire, because it is. We should not be modelling ourselves on the climate laggards of Australia; their standard is not the response the science demands if we are to remain below 1.5° of warming.

2.3 Percentage rather than Flat rate Fee Cap requested. We don't accept the maximum fees for a high polluting vehicle should be capped at \$3000. This would make no difference in buying decisions for someone buying a \$200,000 polluter like a Ferrari or a Bentley. We request that the maximum is instead capped at 30% of the sale price of the

vehicle to actually act as a disincentive to buying polluters. We are keenly aware these vehicles will typically be on the road for 15 -20 years, polluting away - the climate simply can not stand this: we need really powerful disincentives for buying highly polluting cars as well as incentives for buying zero and low emission vehicles.

2.4. Weight Based Emissions for Clean Car Standard Inappropriate We request that the weight adjusted standard for imports be replaced with accommodation level bands - e.g. same emission levels for all 4 seaters. A 3 tonne Rolls Royce should not be allowed to pollute any more than any other 4 or 5 seater just because it's heavy. Likewise, a 2 seater Ferrari shouldn't be granted a reduced emission cost simply because it has a huge heavy engine compared to a light efficient 2 seater. A 4WD ute that can carry 1.5 tonne in its tray should be charged a set rate for its emissions regardless of how much it weighs. The way things are written at the moment the incentive for choosing a lighter (=more efficient) vehicle rather than a heavy one is missing. This needs to change. Many people currently buy a much bigger vehicle than they need for 95% of the time - there needs to be an incentive for choosing the lightest, most efficient vehicle rather than encouraging buying overweight vehicles.

2.5 Multiple Targets for Each Vehicle type rather than Single Target for each Manufacturer's Fleet . We support multiple targets but not as you have defined it. We request a target for each type of vehicle (not vehicle weight) each year. And these emission targets become progressively lower each year.

2.6 No Grouping of Vehicles with other Manufacturer. We do not support allowing a manufacturer of particularly polluting vehicles to group their emissions with another manufacturer of low or zero emission vehicles so they can be allowed to import these polluters. Note that with our proposed tweaking of the multiple targets above to be based on vehicle type, if a vehicle manufacturer like Isuzu only made 4WD utes, they would have a specific and realistic target band, so they wouldn't be disadvantaged for not selling lightweight 2WD cars that are inherently lower emission.

2.7 Treat Near-New Vehicles as New. We request that low km, late model, healthy battery vehicles be given the same rebate incentives as brand new vehicles. The nearly new ones are already made; buying second hand has a lower environmental footprint than

buying brand new. Its low emission vehicles that we want to encourage - whether they are brand new or second hand, they are still a new import into the country; there should be no difference. Our Convenor bought a second hand 2016 model 30kWh Nissan Leaf in 2017. It had only been driven 5000km and was like new - it even still smelt like a new car. Why should we not incentivise people just as much to buy these nearly new cars? If you give an \$8000 incentive only to people buying a \$50,000 car you miss out a whole range of people for whom a \$2600 rebate off a \$30,000 car is simply still not enough of a help to go zero emission.

2.8 Farmer and Rural Contractor Feebate Waiver. We request you include some sort of waiver of these charges for those who genuinely need a vehicle for which there are no realistic low emission alternatives - and presently that is off-road capable 4WD utes for farmers and rural contractors. Currently a lot of tradespeople have them unnecessarily when an electric van that is readily available would do just as well. And a lot of townsfolk have 4WD double cab utes that are rarely if ever taken to areas a 2WD vehicle or smaller 4WD vehicle couldn't handle. This needs to stop. But farmers and rural contractors who genuinely need these vehicles should be given a waiver. We think it would be a good sign that you are listening to rural folk if you waived them from the scheme on an annually reviewed basis, but at the same time ratcheted up the whole scheme to bring it in sooner and harder.

2.9 Timing - 2020 Start Requested As noted before - this is a climate crisis - its time to be fast and furious about our response to this - we can't wait for a leisurely start. Emissions from vehicles we buy today will be locked in for more than a decade - we need to nudge people into buying a low emission version ASAP. It must be made to happen in the early part of next year - put more resources into it to make that happen, we need war-like urgency on this AND economists are suggesting more government spending to keep the economy ticking over - you have a double reason for implementing this scheme quick-smart!

Thank you for the opportunity to submit
on this important part of our Climate Crisis response.

Peter Olorenshaw

Convenor Nelsust Inc.