

OC241453

7 February 2025

Tēnā koe [REDACTED]

I refer to your email dated 18 December 2024, requesting the following under the Official Information Act 1982 (the Act):

- *Any **correspondence since 1 June 2023 between SOC NZ Limited and/or TUV SUD** (or their officers) and the Ministry of Transport regarding accepting or rejecting A**, C**, or D** vehicle emissions codes (used vehicles from Japan) as suitable for compliance for entry to the NZ fleet.*
- *Any correspondence **since 1 June 2023 between VTNZ Limited and/or DEKRA** (or their officers) and the Ministry of Transport regarding accepting or rejecting A**, C**, or D** vehicle emissions codes (used vehicles from Japan) as suitable for compliance for entry to the NZ fleet.*
- *Any correspondence **since 1 June 2023 between the Motor Industry Association** (or their officers) and the Ministry of Transport regarding accepting or rejecting A**, C**, or D** vehicle emissions codes (used vehicles from Japan) as suitable for compliance for entry to the NZ fleet.*
- *Any advice given on the suitability of A**, C**, and D** emissions codes to be acceptable from New Zealand Transport Agency (NZTA)*
- *Any minutes of meetings between MOT and any or all of the entities mentioned above (physical or virtual) where this subject is discussed (it need not be the only topic of discussion).*
- *Any minutes of meetings between Ministry of Transport and New Zealand Transport Agency to discuss the suitability of A**, C**, or D** emission codes”*

Six documents fall within the scope of your request and are detailed in the document schedule attached as Annex 1. The schedule outlines how the documents you requested have been treated under the Act.

Certain information is withheld under the following sections of the Act:

9(2)(a) to protect the privacy of natural persons

Certain information is refused under the following section of the Act

18(d) the information requested is publicly available.

With regard to the information that has been withheld under section 9 of the Act, I am satisfied that the reasons for withholding the information at this time are not outweighed by public interest considerations that would make it desirable to make the information available.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website www.ombudsman.parliament.nz

The Ministry publishes our Official Information Act responses and the information contained in our reply to you may be published on the Ministry website. Before publishing we will remove any personal or identifiable information.

Nāku noa, nā



Siobhan Routledge
Director Aviation

Annex 1

#	Type of document	Date	Title	Treatment
1	PDF document	22 June 2023	SOC NZ Limited- Submission: The proposed changed to the Land Transport Rule: Vehicle Exhaust Emissions 2007	Refused in full under section 18(d) as the information requested in publicly available on the Ministry's website here
2	PDF document	26 June 2023	MIA submission: Vehicle Exhaust Emissions Amendment 2023	Refused in full under section 18(d) as the information requested in publicly available on the Ministry's website here
3	Email	9 September 2024	FW Lobbying of MOT to change emissions code acceptance	Some information withheld under section 9(2)(a)
3.1	Word document		Explanation of Test Regimes and values for MOT.doc. <i>This document is attached to doc #3 "Email FW Lobbying of MOT to change emissions code acceptance"</i>	Release in full
3.2	PDF document	27 January 2024	Explaining road transport emissions- A non-technical guide. Pdf <i>This document is attached to doc #3 "Email FW Lobbying of MOT to change emissions code acceptance"</i>	Refused in full under section 18(d) as the information requested in publicly available on the Ministry's website here
3.3	Word document	1 March 2020	ICCT-NZ report and memo on conversion factor report final.pdf. <i>This document is attached to doc #3 "Email FW Lobbying of MOT to change emissions code acceptance"</i>	Refused in full under section 18(d) as the information requested in publicly available on the Ministry's website here
4	Email	26 July 2023	JP-EU equivalency work for Dan to review	Some information withheld section under 9(2)(a)
4.1	Excel spreadsheet		JP-EU equivalency work.xlsx <i>This document is attached to doc #4 "Email JP equivalency work for Dan to review"</i>	Release in full
5	Email	11 October 2024	RE: Info how Euro/Japan equivalencies were determined?	Some information withheld under section 9(2)(a)
6	Email	4 December 2024	RE: OC241305-Vehicle emissions codes	Some information withheld under section 9(2)(a)
6.1	PDF document	2019	Delphi emissions booklet 2019-2020-Passenger Car-Light-Duty-Vehicle.pdf <i>This document is attached to doc #6 "Email: RE: OC241305-Vehicle emissions codes"</i>	Refused in full under section 18(d) as the information requested in publicly available on the Ministry's website here

Doc #1: FW: Lobbying of MOT to change emission code acceptance

From: [Gayelene Wright](#)
To: [Liz Hopgood](#)
Subject: FW: Lobbying of MOT to change emission code acceptance
Date: Friday, 11 October 2024 10:17:21 am
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[Explanation of Test Regimes and values for MOT.doc](#)
[Explaining roadtransport emissions — A non-technical guide.pdf](#)
[ICCT - NZ conversion factor report_20210302_final \(1\).pdf](#)
[ICCT Memo on conversion factor revision_vf KG.docx](#)

From: s 9(2)(a)
Sent: Thursday, September 19, 2024 2:03 PM
To: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>; Anna Cleary <Anna.Cleary@nzta.govt.nz>
Cc: Karl Lauulu <Karl.Lauulu@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>; Gayelene Wright <g.wright@transport.govt.nz>
Subject: RE: Lobbying of MOT to change emission code acceptance

Hi All

Sorry for the lengthy delay in sending you something with my views and a little more content on the acceptance of certain 3 digit emission codes for Japanese used imports.

I have written a short summary and attached a couple of useful documents,

I hope this helps.

Best regards.

s
9(2)
(a)

SOC NZ Limited

Tel : s 9(2)(a)

Email s 9(2)(a)

Website : www.socnz.co.nz

SmallLogo



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From: s 9(2)(a)
Sent: Thursday, 22 August 2024 11:01 am
To: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>; Anna Cleary <Anna.Cleary@nzta.govt.nz>

Cc: Karl Lauu <Karl.Lauu@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>

Subject: RE: Lobbying of MOT to change emission code acceptance

Hi Blake

Thanks.

s
9(2)
(a)

SOC NZ Limited

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From: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>

Sent: Thursday, August 22, 2024 10:49 AM

To: s 9(2)(a) Anna Cleary <Anna.Cleary@nzta.govt.nz>

Cc: Karl Lauu <Karl.Lauu@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>

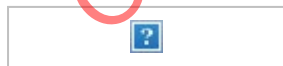
Subject: RE: Lobbying of MOT to change emission code acceptance

H s
9(2)

Thanks for the emails on this. Just acknowledging we are receiving and thinking about them at the moment. I've cc'd in Karl Lauu and Lily McSweeney as well who are also working on the Exhaust Emissions Rule.

Blake

Blake Shepherd
Principal Advisor
System Policy, System Leadership Group
M s 9(2)(a)
E blake.shepherd@nzta.govt.nz / w nzta.govt.nz



From: s 9(2)(a)

Sent: Thursday, August 22, 2024 10:45 AM

To: Anna Cleary <Anna.Cleary@nzta.govt.nz>

Cc: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>

Subject: RE: Lobbying of MOT to change emission code acceptance

Hi Anna

I should probably have explained, the essence of trying to understand emissions testing, is not in the tailpipe values, it is in the way those values are achieved and the specific test methods used.

The most noticeable difference between EU NEDC and the Japanese test regimes of JC08 and J10-15, is that the testing cycle in EU, starts from the moment you start the car, when the vehicles fuel enrichment device is activated , therefore producing a large percentage of the pollutants captured....both Japanese test regimes have a warm up period, allowing the system to clear the pollutants from the start up procedure.

However, the Japanese test cycle was designed for giving best results from a car with a small engine (around 1000cc), driving in an urban setting with a top speed of 80kph, whereas the EU NEDC cycle is designed for vehicles with around a 2000cc engine driving under mixed conditions and up to 120kph. Cars designed for the market where the local test regime and process is prevalent will be designed to pass those emission tests, so if they don't then there is a good reason why.

Best regards.

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9(2)
(a)

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From: s 9(2)(a)

Sent: Thursday, August 22, 2024 10:32 AM

To: Anna Cleary <Anna.Cleary@nzta.govt.nz>

Cc: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>

Subject: Re: Lobbying of MOT to change emission code acceptance

Hi Anna

Thanks.

This was some reasonably in depth work a few years ago and there is much more info than I have

already supplied.

I have also reached out to our partners in Japan (TUV SUD JP.) and requested them to supply any information they think will help.

If Blake or any others in your team would like to discuss, please contact me.

Best regards.

s
9(2)
(a)

SOC NZ Limited

Tel s 9(2)(a)

Email s 9(2)(a)

Website : www.socnz.co.nz

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On 22 Aug 2024, at 10:27, Anna Cleary <Anna.Cleary@nzta.govt.nz> wrote:

Kia ora s 9(2),

Thanks for the email – I'm doing well and hope you and the Hutt hills are too

I've shared your email and attachments with our team, and I'm also CC'ing our lead on the work into this email, one of our excellent Principal Advisors, Blake Shepherd.

As you know, we're always keen to ensure all views are captured and taken into account, so this info is much appreciated, I hope it's not the last info-sharing that takes place either.

Cheers,

AC

Anna Cleary (She/Her)

Manager, Regulatory Policy

Policy | Te Tūāpae System Leadership

Email: anna.cleary@nzta.govt.nz

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

NZ Transport Agency Waka Kotahi

44 Bowen Street
Private Bag 6995, Wellington 6141, New Zealand

[Connect with us on social media](#)

<image001.png>

From: s 9(2)(a) >
Sent: Thursday, August 22, 2024 8:32 AM
To: Anna Cleary <Anna.Cleary@nzta.govt.nz>
Subject: Lobbying of MOT to change emission code acceptance

You don't often get email from s 9(2)(a) [Learn why this is important](#)

Hi Anna

Hope you are well.

Are you involved with advising MOT on the recent lobbying they have received to accept further emission codes on vehicles from Japan?

I must admit, it makes me pretty annoyed that certain industry associations think that this should be re-visited after extensive consultation which, if anything landed on their side of the fence with the codes that we accept currently.

From the research completed prior to and during 2022, the closest to EU5 is actually Japan 2018, but it was accepted that if that was the minimum accepted standard, then there would be a significant negative affect on the volume used car import industry, to the extent that it may not survive, therefore allowances were made for D** codes.

I have significant research on this subject, if you need any, but in reality, you should not need anything more than the ICCT report commissioned by MOT in 2021, which is fairly clear.

I have attached a few documents you may find interesting, they show the differing test cycles and how they work, along with opinions etc.

Ultimately, it is fully accepted that equivalence is an unachievable goal, where test procedures are concerned, but in the previous consultation and eventual regulation, the MOT took a pragmatic approach, the Japanese test procedures do not even measure some of the relevant and measured content that the EU system does at similar ages.

Please contact me if you would like to discuss further or need any more information.

Best regards.

s
9(2)
(a)

SOC NZ Limited

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Website : www.socnz.co.nz

<image004.jpg>

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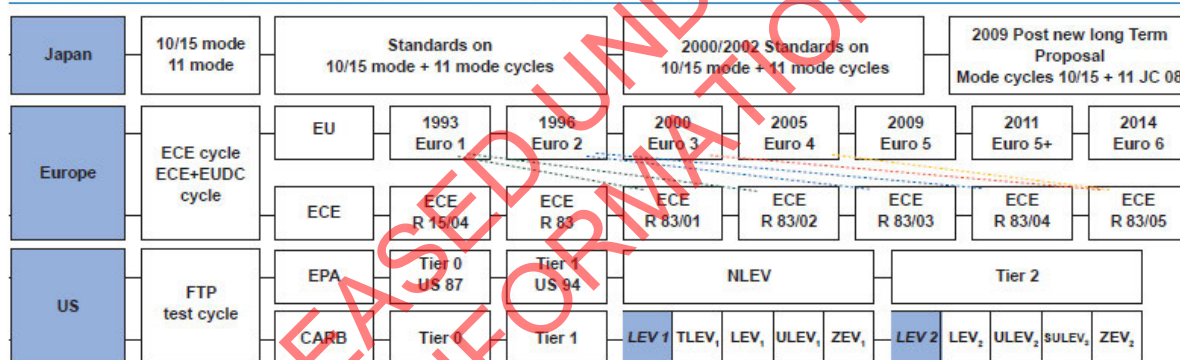
Importance of understanding Emissions Test Cycle application.

High level overview

Over the past 40+ years, there have been continuous development of measuring and identifying vehicle emissions and until the recent development and acceptance of Real Driving Emissions (RDE) testing, which has broadly aligned different countries methods and procedures for measuring vehicle emissions (while allowing local driving conditions to be accommodated).

While the development and adoption of the RDE testing regimes (broadly from 2018 on) has gone a long way to align the emissions values being recorded at the tailpipe, previous differing test procedures from multiple countries, use significantly different approaches, therefore meaning the results at tailpipe are largely unreliable if being used in comparison across markets, specifically when being used as a benchmark for developing a universal method to assess a vehicles emissions when being imported into New Zealand as a used vehicle.

WORLDWIDE TESTING PROCEDURES AND STANDARDS



European Union countries: Austria, Belgium, Bulgaria, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, United Kingdom.
Candidate Members: Croatia, Former Yugoslav Republic of Macedonia, Turkey

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EUROPEAN UNION

DRIVING CYCLES: NEDC

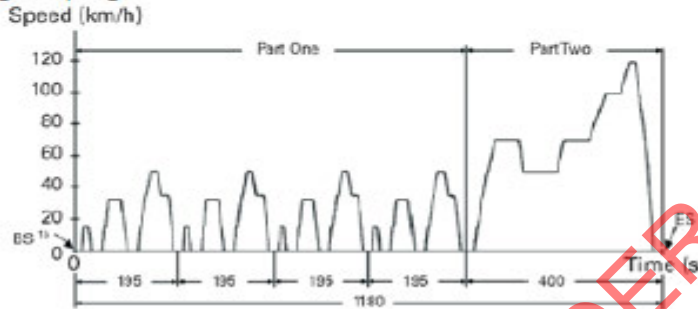
URBAN (ECE) + EXTRA-URBAN (EUDC) CYCLE.

Prior to Euro 3 (MVEG-A: ECE+EUDC).

- Bag sampling starts after 40s idle period.

Cycle revision for Euro 3 onwards (MVEG-B: NEDC).

- Modification of the start-up phase: deletion of the 40s idle period prior to bag sampling.



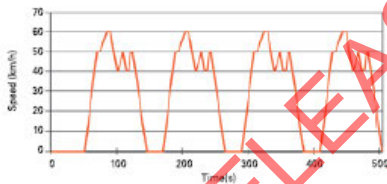
- 1) BS: Beginning of Sampling at engine start.
- 2) ES: End of Sampling.

JAPAN

DRIVING CYCLES

11 MODE COLD CYCLE

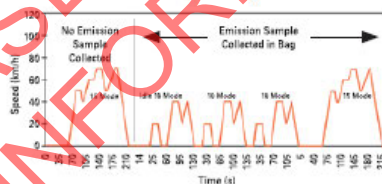
Japan 11 mode



Distance: 4.084 km Max. speed: 60 km/h
Duration: 480 s Average speed: 30.6 km/h

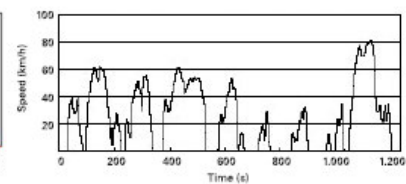
10-15 MODE COLD CYCLE

Japan 10-15 Exhaust Emission & Fuel Economy Driving Schedule



Distance: 6.34 km Duration: 892 s Average speed: 25.61 km/h
(Preceded by 15 min warm-up at 60 km/h, idle test, 5 min warm-up at 60 km/h)
Emissions are measured during the last 4 segments:
Distance: 4.16 km Max. speed: 70 km/h
Duration: 660 s Average speed: 22.7 km/h

Driving cycle JC 08



Distance: 8.2 km Max. speed: 80 km/h
Duration: 1205 s Average speed: 24.4 km/h

By studying the below tables, which are comparisons of the regime process, it can be seen that while the tailpipe emissions remain constant (M class vehicles/passenger cars) throughout the European standards EU5a, EU5b, EU6b, EU6c, EU6d Temp and EU6d, as in the Japanese standards

EUROPEAN UNION

EURO 5-6

Emissions	Unit	PC M ¹ , LCV N1 CL 1			LCV N1 CL 2			LCV N1 CL 3, N2		
		Euro 5a	Euro 5b/b+	Euro 6b, 6c, 6d-Temp, 6d	Euro 5a	Euro 5b/b+	Euro 6b, 6c, 6d-Temp, 6d	Euro 5a	Euro 5b/b+	Euro 6b, 6c, 6d-Temp, 6d
EURO 5-6 Positive ignition emissions limits ((EC) 715/2007 as amended (EC) 692/2008)										
THC	mg/km	100	100	100	130	130	130	160	160	160
NMHC		68	68	68	90	90	90	108	108	108
NOx		60	60	60	75	75	75	82	82	82
CO		1000	1000	1000	1810	1810	1810	2270	2270	2270
PM ^{2.3}		5.0	4.5	4.5	5.0	4.5	4.5	5.0	4.5	4.5
PN ^{2.3}	Nb/km	-	-	6x10 ¹¹⁻¹³	-	-	6x10 ¹¹⁻¹³	-	-	6x10 ¹¹⁻¹³
EURO 5-6 Compression ignition emissions limits ((EC) 715/2007 as amended (EC) 692/2008)										
NOx	mg/km	180	180	80	235	235	105	280	280	125
HC+NOx		230	230	170	295	295	195	350	350	215
CO		500	500	500	630	630	630	740	740	740
PM ^{1.3}		5.0	4.5	4.5	5.0	5.0	4.5	5.0	5.0	4.5
PN ^{1.3}		Nb/km	-	6x10 ¹¹	6x10 ¹¹	-	6x10 ¹¹	6x10 ¹¹	-	6x10 ¹¹

- 1) For compression ignition only: exempted M1 vehicles have to comply w/ N1 CL3 test limit.
No more exemption for pass cars for Euro 6.
2) Test procedure defined in UN Reg 83 Suppl 7.
- 3) Applicable to PI DI engines only.
4) Until 3 years after the dates for TA/FR particle emission limit of 6x10¹² may be applied for Euro 6b positive ignition DI vehicles upon request of manufacturer.

JAPAN

EMISSIONS STANDARDS – GASOLINE AND LPG VEHICLES

	Year	Vehicle Category	Test Mode	Unit	CO	NMHC	NOx	PM ¹⁰
					g/km	g/km	g/km	g/km
New Short Term	2000	Passenger Car	10-15 Mode	g/km	0.67	0.08	0.08	-
	2002	Mini Commercial Vehicle	11 Mode	g/test	19.0	2.20	1.40	
			10-15 Mode	g/km	3.30	0.13	0.13	
	New Long Term	2000	Light Commercial Vehicle (GVW ≤ 1.7 t)	10-15 Mode	g/km	0.67	0.08	
2001		Medium Commercial Vehicle (1.7 t < GVW ≤ 3.5 t)	11 Mode	g/test	19.0	2.20	1.40	
			10-15 Mode	g/km	2.10	0.08	0.13	
			11 Mode	g/test	24.0	2.20	1.60	
Post New Long Term	2005	Passenger Car	JC08	g/km	1.15	0.05	0.05	
	2007	Mini Commercial Vehicle			4.02			
	2005	Light Commercial Vehicle (GVW ≤ 1.7 t)			1.15			
	2005	Medium Commercial Vehicle (1.7 t < GVW ≤ 3.5 t)			2.55			
Future Regulations	2018	Passenger Car	WLTP	g/km	1.15	0.10	0.05	
		Mini Commercial Vehicle			4.02			
		Light Commercial Vehicle (GVW ≤ 1.7 t)			1.15			
		Medium Commercial Vehicle (1.7 t < GVW ≤ 3.5 t)			2.55			
Future Regulations	2019	Passenger Car	WLTP	g/km	1.15	0.15	0.07	
		Medium Commercial Vehicle (1.7 t < GVW ≤ 3.5 t)			2.55			

- 1) PM limit applied for stoichiometric direct injection gasoline engines. It will be effective from Dec. 2020 for new vehicles and Nov. 2022 for existing vehicles. Number in bracket is upper limited value.

JAPAN

OTHER REQUIREMENTS

Test Mode	Exhaust emissions are calculated as follows: From Oct 2005: 10-15 mode hot start x 0.88 + 11 mode cold start x 0.12. From Oct 2008: 10-15 mode hot start x 0.75 + JC08 mode cold start x 0.25. Since Oct 2011: JC08 mode hot start x 0.75 + JC08 mode cold start x 0.25. From 2019: WLTP. Japan has a plan to introduce RDE regulation for some diesel vehicles. (GVW < 2.5 t, or less than 9 people) from Oct 2022 for new Type Approvals, and from Oct 2024 for Continuous Production Vehicles. RDE test procedure will differ from RDE in Europe due to different driving conditions. RDE method will be based on 3 phases WLTP.
In-use Vehicle Emission Limit	PC: Idle CO: 1%. Idle HC: 300 ppm. Small car (K-car) : Idle CO: 2%. Idle HC: 500 ppm. Diesel Smoke: non-load acceleration limit 25% / max PM: 0.8 m ⁻¹ .
Durability	PC, truck and bus GVW < 3.5 t: 80,000 km.
Evaporative Emissions – Gasoline and LPG	Test similar to EC 2000 Evap test: Test limit: 2.0 g/test. 1 h hot soak at 27 ± 4°C HSL test + 48 h diurnal (20-35°C) DBL test. Preparation driving cycle for EVAP: JC08 mode.
OBD – Gasoline and LPG	J-OBDII obligation: Enhanced OBD: detect any malfunctions causing excessive emissions on the test cycle.
Fuel Quality	Gasoline Lead: Not detected (JIS K2255-4.5) MTBE: max. 7 vol.% Sulfur: max. 0.001 mass% Oxygen: max. 1.3 vol.% (JIS K2536-2.4.6) Benzene: max. 1 vol.%
	Diesel Sulfur: max. 0.001 mass% Distillation at 90%: max. 360°C (JIS K2254) Cetane index: min. 45 (JIS K2280)

What is demonstrated by the above information is that the eventual tailpipe emissions have been set at a constant over the more stringent emissions codes applied to both Japanese standards and European standards, therefore the changes to improve outcomes, must be achieved by the method of measuring those emissions, meaning that the conditions of measurement and timings of measurement (in an attempt to replicate a more realistic drive cycle) will have a significant effect on the outcome.

The above information shows that the Japanese JC08 method uses a variety of 'Hot Start' process' to achieve the differing emission codes allocated to specific vehicles, using a percentage of the old 10-15 method, blended with the newer JC08 method, meaning that the vehicle has been running for a period of time prior to any sampling of tailpipe gasses being performed, whereas the two other comparison test regimes (EU and USA), both use a cold start method, meaning that tailpipe sampling is conducted throughout the test period.

This may not appear to be a large difference, however, it is generally accepted that, if compared under similar general test conditions, during identical periods of test throughout start-up and after the vehicle has been running for a short while, readings which may differ by as much as 40% (over the start period timing)

The document attached to the email on this general summary, gives a fairly good low level explanation of emissions and on page 23 there is a fairly simple summary of test methods, which state how the Japanese test methods use hot and cold tests to gain their eventual readings and the chart on page 3 of this report gives detail of the specific percentages.

The comparison or equivalence between different countries standards is an impossible task, this was identified in the ICCT report commissioned by and delivered to MOT in 2022 (attached to the email with this report).

The only real way to confirm if Japanese Domestic Market Vehicles meet EU5 emissions would be to have them fully tested by an approved EU emissions test facility with a certified operator.

Whereas European 17 digit VIN identified vehicles can be significantly different technically, while having similar VIN numbers, as the specifics are controlled and identified by the 'Variant and Version' of these vehicles, not specifically the VIN. The Japanese Domestic Market (JDM) vehicles are (I am informed) identical, as identified by the model code, normally found on the Chassis Plate of the vehicle.

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Conclusion

For the majority of European (and some other 17 digit VIN numbered) vehicles showing a 3 digit emission standard on their Japanese Export Certificate and sold new in Japan, then exported to NZ as used imports at a later date, we are able, through our partners in Germany, to provide at a small cost, certificates to confirm the EU emissions status of these vehicles (we set this process up in 2011 and it has been running since then), where they are specifically identified on the EU database, therefore no problem exists for these vehicles.

For JDM vehicles which when tested to EU standards might meet EU emission standards, I would suggest that I engage with our partners in Germany and gain a quote to complete the EU testing on the vehicles in question and as (unlike EU 17 digit VIN numbered vehicles) the model code should reflect identical technical specification then a model code database for JDM vehicles could be compiled to show which are compliant and which are not.

I cannot stress how important for equitability it is, that if this testing of JDM vehicles were to be completed, it would need to be done using the correct testing facilities and testing methods.

I should also stress, that however clever Artificial Intelligence is and as has been demonstrated recently in many reports of the incorrect results being achieved by employing artificial intelligence, that any solutions based on this technology could be liable to challenge and knowing the depth of the subject matter would most likely be fictitious.

Joe Barnett

Director SOC NZ Ltd.

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

From: [Dan Myers](#)
To: [Sigurd Magnusson](#)
Cc: [Gavelene Wright](#)
Subject: RE: JP-EU equivalency work for Dan to review.
Attachments: [image001.png](#)
[image002.png](#)

Hi

Monday at 10am should be ok – I will be in the Palmerston North office in the morning and in training all afternoon, so if I don't dial in can we have Tuesday as a backup? Any time.

Re. #2 below:

Kit's calcs assume that only HC and NOx reduce with the 25%/50%/75% reductions in the standards and info from Fumi supports this, here is the data for Japan 2018:

Next Phase Regulation			
Test Mode	Components	Enforcement year	Standard value
WLTC (g/km) ※7	CO	2018	2.03 (1.15)
	NMHC		0.16 (0.10)
	NOx		0.08 (0.05)
	PM		0.007 (0.005)

Attached Table 6 (Related to Article 5)

**STANDARD OF APPROVAL OF ARTICLE 5 CONCERNED WITH
MOTOR VEHICLES IN ITEM (A) OF TABLE IN ITEM (3) OF
ARTICLE 5**

Standard	Contents of standard concerned			
	Respective values posted in the right column of the said Table concerning measurement substances included in emissions of Item (2) of Article 4			
	Carbon monoxide	Non-methane hydrocarbon	Nitrogen oxide	Particulate matter
1. Exhaust emission level 25% lower than that of 2018 standard	1.15 or less	More than 0.05, but 0.075 or less	More than 0.025, but 0.038 or less	Extremely small quantities
2. Exhaust emission level 50% lower than that of 2018 standard	1.15 or less	More than 0.025, but 0.05 or less	More than 0.013, but 0.025 or less	Extremely small quantities
3. Exhaust emission level 75% lower than that of 2018 standard	1.15 or less	0.025 or less	0.013 or less	Extremely small quantities
Remarks:				
1. The provisions of Item 1 of the Remarks of Attached Table 1 shall apply to the definition of terms appearing in this table.				
2. The provisions of Item 2 of the Remarks of Attached Table 1 shall apply to the method for selecting the standard with which the motor vehicle concerned with the application complies in this table.				

Regards

Dan Myers

Senior Principal Engineer, Vehicle Standards

Te Rōpū Waeture | Regulatory Services

Email: Dan.Myers@nzta.govt.nz

Phone: s 9(2)(a)

Mobile: s 9(2)(a)

Waka Kotahi NZ Transport Agency

From: Sigurd Magnusson

Sent: Wednesday, 26 July 2023 2:38 pm

To: Dan Myers

Cc: Gayelene Wright

Subject: JP-EU equivalency work for Dan to review.

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Dan,

Thanks for talking for a few hours today. As discussed please review the attached. I'm satisfied with the quality of the work, subject to your review, however there two items I don't know the answer to (see coloured text below and in the attached). The latter I've queried our Japanese official some time ago (I will chase). Are you able to ask Fumi today what she can explain on these two matters?

1. *Note: In 2023, most imported petrol vehicles are manufactured between 2009 and 2018 but use the "D" code indicating Japan 2005 regulations. It is therefore possible these are still only meeting Japan 2005 limit values, i.e. no PM limit, rather than meet the Japan 2009 limit values.*
2. *The above assumes that NO, PM, CO reduce with the Dxx, 4xx, 5xx, codes. It is not certain which pollutants must be lower to be awarded those codes.*

Ideally it would be good if we discuss any feedback you have on the spreadsheet on **Monday**.

Does 10am Monday suit?

Cheers

Sigurd

Sigurd Magnusson

Senior Adviser - Environment, Emissions and Adaptation

Ministry of Transport – Te Manatū Waka

s 9(2)(a)

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From: [Lily McSweeney](#)
To: [Nick Paterson](#); [Karl Laulu](#)
Cc: [Gayelene Wright](#); [Carol Rios Diaz](#); [Liz Hopgood](#); [Blake Shepherd](#)
Subject: RE: Info on how Euro/Japan equivalencies were determined?
Date: Tuesday, 15 October 2024 2:58:04 pm
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hi Nick and Liz –

Thanks Nick for that clarity, understood. Our previous communication was based on that the prior work on this had been Ministry led, and we (personally, not the organisation) were not directly involved – however we recognise the change in personnel on your side too and are happy to have this back on the regulator again.

I will provide more fulsome information regarding Liz's request this week but here is a starter

Note, I have switched from using "equivalency" to "alignment" – I think this better recognises that the various standards from different parts of the world will never be exactly equivalent in every factor. It isn't NZ's role to create harmonisation between the international standards, rather it is NZ's role to ensure that the standards we list as our minimum requirement are creating roughly similar outcomes in the vehicles we allow.

Firstly, confirming that Karl and I will do / lead the work to review the justification of how we determined alignment as per the VIA request, well supported by our SME's – key here on our side will be Dave Brown, Dan Myers, and Fumi Norman, among others. We have not (as far as I am aware) kicked off the review of justification beyond the initial conversations we had when the issue was first raised. This is because we are focusing on the issue (ISC) still outstanding for the first amendment and do not want to overstretch the time and goodwill of our SME's who have other workloads as well as advising on these technical matters.

In my opinion, the aims of the work will be to:

- Identify the justifications that we used to determine alignment between Japanese and European standards (Currently in progress)

- Ensure that these justifications remain sound and are achieving the desired outcome of *(TBC but something to do with NZ accepting standards that are as aligned as possible from a variety of jurisdictions to ensure vehicles being imported from around the globe are meeting similar emission targets / passing similar emission tests)*

- If determined that the justification is not sound, action how we can resolve identified issues.

Regarding the request on info for how we determined the alignments, I am still pulling this together from my end and will give you a debrief soon (I am aiming for an initial set of info to you tomorrow). It would be useful, if you haven't already, to have a look in TARDIS and see if Sigurd had saved any relevant documents in there?

Cheers!

Lily McSweeney (She/Her)

Policy Advisor, Users and Vehicles System Policy

System Policy | Te Tūāpae System Leadership

Email: lily.mcsweeney@nzta.govt.nz

Phone: s 9(2)(a)

Waka Kotahi NZ Transport Agency

From: Nick Paterson <N.Paterson@transport.govt.nz>

Sent: Monday, October 14, 2024 10:04 AM

To: Karl Laulu <Karl.Laulu@nzta.govt.nz>

Cc: Gayelene Wright <g.wright@transport.govt.nz>; Carol Rios Diaz <C.RiosDiaz@transport.govt.nz>; Liz Hopgood <L.Hopgood@transport.govt.nz>; Blake Shepherd <Blake.Shepherd@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>

Subject: RE: Info on how Euro/Japan equivalencies were determined?

Hi Karl,

Thank you for your email. This is an issue that we would need the NZTA to review as the regulator. I understand that at the the time there was an agreement for the MoT to do this work, although this would normally be a matter that the regulator would lead, as we had the capacity and capability to do that. MoT no longer has the capability to undertake this work, and as we are not a regulatory agency we are not actively seeking to replace this capability.

Kind regards

Nick

Nick Paterson

T: s 9(2)(a) | E: n.paterson@transport.govt.nz | www.transport.govt.nz



From: Karl Laulu <Karl.Laulu@nzta.govt.nz>

Sent: Friday, October 11, 2024 12:04 PM

To: Liz Hopgood <L.Hopgood@transport.govt.nz>; Blake Shepherd <Blake.Shepherd@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>

Cc: Gayelene Wright <g.wright@transport.govt.nz>; Carol Rios Diaz <C.RiosDiaz@transport.govt.nz>

Subject: RE: Info on how Euro/Japan equivalencies were determined?

Hi Liz,

We have worked closely with our SMEs, and they've confirmed equivalency was introduced into the 2023 consultation by the Ministry.

Below is a snippet of content used during the consultation information session lead by MOT, where the Ministry has determined and labelled equivalents as well as the Japanese standards as being weaker:

Accepted Emissions Testing Standards from other Jurisdictions

- Appropriate equivalencies need to be selected.
- Emission limits and testing practices between the standards do not all align exactly.

Euro 5 equivalents	Alignment with Euro 5	Euro 6d equivalents	Alignment with Euro 6d
US Tier 2	Stronger	US Tier 3	Stronger
Japan 2005	Weaker	Japan 2018	Weaker
ADR 79/04	Aligns	Future ADR79/05	Expected to align
UNECE R83/06	Aligns	Future UNECE R83/08	Expected to be stronger



Dan Myers has provided me with emails confirming MOT were provided data (email attached) from Japan authorities who compared results of vehicles tested to JC08 and WLTP. The WLTP emissions were up to five times greater than JC08. This confirmed that Japan 2005 should not be directly compared to Euro 5 or 6. He also provided the attached spreadsheet (embedded in JP-EU email) produced by Sigurd detailing his take on equivalency which I believe was then later used to finalise 2023 Amendment Rule definitions for Japan 2005 low harm currently in-force.

For me, the above information clearly serves things back to the Ministry to determine the best way forward, keeping in mind our SMEs have advised we steer away from the use of 'equivalence' for emissions standards.

Cheers

Karl Laulu (He/Him)

Senior Policy Advisor, Users and Vehicles

System Policy | Te Tūāpae - System Leadership | s 9(2)(a)

From: Liz Hopgood <L.Hopgood@transport.govt.nz>

Sent: Friday, October 11, 2024 10:51 AM

To: Blake Shepherd <Blake.Shepherd@nzta.govt.nz>; Lily McSweeney <Lily.McSweeney@nzta.govt.nz>; Karl Laulu <Karl.Lauulu@nzta.govt.nz>

Cc: Gayelene Wright <g.wright@transport.govt.nz>; Carol Rios Diaz <C.RiosDiaz@transport.govt.nz>

Subject: Info on how Euro/Japan equivalencies were determined?

Hi Blake, Lily, Karl

Hi, hope you are well

I'm hoping one of you may be able to help me out with any info you have on how the Euro/Japan equivalencies were originally determined?

(and confirming, will you be/are you doing the current work on reviewing these? If not are

you able to connect me with who is. It may be good for us to get an update on what's happening in this space).

Thank a lot

Liz Hopgood

Kaitohutohu | Adviser, Environment

Te Manatū Waka Ministry of Transport

M: s 9(2)(a) | L.Hopgood@transport.govt.nz | www.transport.govt.nz



I work Monday, Tuesday, Friday

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From: s 9(2)(a)
To: [Carol Rios Diaz](#); [Lily McSweeney](#); [Gayelene Wright](#); [Blake Shepherd](#); [Nick Paterson](#); [Liz Hopgood](#)
Subject: RE: OC241305- Vehicle emissions codes
Date: Wednesday, 4 December 2024 4:49:05 pm
Attachments: [image001.jpg](#)
[Delphi emissions booklet 2019-2020-Passenger-Car-Light-Duty-Vehicles-.pdf](#)

Hi Carol et al,

Thanks for the response.

The essence of understanding emissions is to accept that the way the emissions are measured, and the test regime is designed are the important factors.

It appears that MLIT are stating that a vehicle tested to JC08, when tested using WLTP would show 5-6 times greater tailpipe emissions would be recorded.

It appears that when the difference between a vehicle being tested using NEDC and WLTP is generally around 10% (as is easily demonstrated using the ICCT conversion factors used by MOT) and it should be accepted that the WLTP4 test regime is substantially similar to NEDC, with the exception that WLTP4 requires an RDE test within to give balance between lab testing and real driving. JC08 (and all previous Japanese test regimes) have a significantly different test sequence for all stages of the test and do not include many factors which go to the final result.

With the statement from MLIT that JC08 produces 5-6 times higher emissions when tested using WLTP, it indicates that no D** codes should be accepted.

In Europe, my partners tell me that with the exception of Japan 2018 not measuring, PM (until 2020), PN on DI petrol and diesel engines, they would consider Japan 2018 to be closer to EU5 than any other Japan emissions standard, although Japan does not capture a significant number of the mandatory requirements for Europe.

Please use the attached Delphi emissions booklet to give an idea of how inferior the Japanese test regime is.

I hope this helps you and please call if you would like to discuss further.

Thanks

s
9(2)
(a)

SOC NZ Limited

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From: Carol Rios Diaz <C.RiosDiaz@transport.govt.nz>

Sent: Wednesday, 4 December 2024 4:06 pm

To: s 9(2)(a)

Subject: OC241305- Vehicle emissions codes

Hi s 9(2)

Please find attached a response to your OIA [OC241305].

Regards,

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