

Ministry of Transport

Clean Cars Standard and

Clean Car Discount

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on *Ministry of Transport's Clean Cars Standard and Clean Car Discount*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General Comments

3. NMH strongly supports the proposals shown in the discussion document that outline actions that will reduce greenhouse gas emissions within the transport sector. Greenhouse gas emissions from the transport sector make up about 20% of New Zealand's total greenhouse gas emissions each year. The 2012 Health and Air Pollution in New Zealand (HAPINZ) report found that harmful emissions from vehicles cause 256 premature deaths (with social costs of \$934 million) annually in New Zealand. Reducing emissions of greenhouse gases through better transport and energy-use choices can result in improved health.¹
4. NMH notes that New Zealand is one of only three developed countries that does not have regulations on vehicle emissions quality, and as a result, has one of the most fuel inefficient and polluting fleets of any OECD country. This has serious implications on the health and wellbeing of New Zealanders, including high rates of asthma, respiratory illnesses, and lung cancer. Children, the elderly, and low income families are particularly vulnerable to poor air quality.²
5. The proposed Clean Car Standard and Discount to increase electric vehicles (EVs) and low-emitting vehicles in New Zealand's fleet is a crucial step towards meeting the emission targets agreed to in the Paris agreement, and those set out in the Zero Carbon Bill. The scheme can lead to significant improvements in health and wellbeing in New Zealand by positively impacting air quality and

¹ <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

² WHO (2014). FAQ: Ambient and Household Air Pollution and Health.
https://www.who.int/phe/health_topics/outdoorair/databases/faqs_air_pollution.pdf

reducing noise pollution. NMH is also pleased to see that a central dataset holding information about vehicle carbon emissions will be created and managed by a government agency.

Specific Comments

6. NMH commend the government for developing a proposal to increase EVs in New Zealand's light fleet. However, the range for electric vehicles is limited,³ research has shown that the biggest inhibitor to buying plug-in vehicles is the limited driving range before a charge is needed⁴. To boost the use of EVs, the number, location and types of chargers need to be greatly increased.
7. There must be a comprehensive plan to map and scale up EV charging infrastructure throughout the country. This is particularly important in the South Island where there can be long distances between towns.
8. In addition, NMH recommends that NZTA and Councils install EV signs so that people can easily locate charging stations.
9. Charging at public charge points differs from filling up at the petrol stations. It will be necessary to educate people on etiquette around charging stations in relation to only charging when necessary, and only as much as needed so that people have easy access to charging stations.⁵ This is important because availability of charging stations will impact on the uptake of EVs.
10. Furthermore, a fund for public charging infrastructure at sites such as hospitals, libraries and councils could be considered to increase greater uptake.
11. The Clean Car discount will only apply to light vehicles. As the technology develops for heavier trade vehicles, NMH encourages the Ministry to consider a similar scheme for heavier vehicles in the future so a greater proportion of New Zealand's vehicle fleet is low emitting. This will have result in improved air quality leading to better health outcomes.
12. NMH commends the government for including a social impact assessment and ensuring that social equity is considered in the proposed Clean Car scheme. With the cost of living steadily increasing in New Zealand⁶, consideration needs to put

³ <https://driveelectric.org.nz/individuals/ev-models-and-where-to-buy/>

⁴ Bonges, H., Lusk, A., (2016) *Addressing electric vehicle (EV) sales and range anxiety through parking layout, policy and regulation*. Transportation Research, Policy and Practice.

⁵ Ibid

⁶ Cost of Living Survey (2019). <https://www.consumer.org.nz/articles/cost-of-living-survey>

in place measures to ensure that people already struggling will not face unequitable financial impacts as a result of the scheme.

Conclusion

13. NMH thanks the Select Committee for the Environment for the opportunity to comment on *Ministry of Transport's Clean Cars Standard and Clean Car Discount*.
14. NMH believes that climate change is a major public health concern and commend the Government for its action in reducing greenhouse gas emissions. This will have significant health co-benefits.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by a long horizontal stroke that ends in a small loop.

Peter Bramley
Chief Executive

