

**Vehicle Exhaust Emissions Amendment 2012  
Summary and analysis of submissions [by Proposal]**

<b>Proposal Number</b>	<b>Submission number</b>	<b>Type</b>	<b>Comment</b>	<b>Submission</b>	<b>Recommendation</b>
1	Y013 (Bus & Coach Association)	Industry representative group	Some members disagree	<p>Some members thought the introduction of new standards should not be delayed, and Euro V standards should be used from 1 Jan 2013. This would help to protect the age of the NZ fleet, and would protect NZ from used heavy vehicles who no longer meet emission standards overseas.</p> <p>Propose Euro V standard be brought in from 1 Jan 2014, instead of waiting for the review. This gives sufficient time for operators to adjust, and ensures NZ is not a 'dumping' ground for old vehicles that do not meet emissions standards overseas.</p>	No change required
1	Y010 (Auckland Council)	Local government agency	Partial agreement	Did not agree with there being no end point defined for updating emissions standards. They prefer a date is set when the used vehicles standard is no longer applicable (e.g. 1 Jan 2016). This would require the proposed government review in 2014 to be formally undertaken.	No change required. The Minister of Transport has said the review will take place, and there are enough incentives to ensure this occurs
1	Y012 (Motor Industry Association)	Industry representative group	Partial agreement	No comment on proposed extension of current standards, but disappointed Japan 09 for used vehicles was not included in this amendment. They believe without changes to the Rule, used imports will become older as the industry focuses its activity on the oldest complying vehicles they can import.	No change required. Will be reviewed in 2014
1	All others		Agree or did not		

			comment		
2	All submissions		Agree or did not comment		
3	Y005	Private individual	Agree in principle	But suggests it is not clear how much variation there is between Euro, Australian, Japanese and US standards. Do significant differences exist if a buyer sources from different overseas manufacturers?	No change required
3	Y015 (Inter Truck NZ Group)	Vehicle dealer	Disagree	Due to a change in technology from EGR (US 2004) to SCR (Euro V) engines over time, the supplier is unable to scope a change to US 2007 emission standards by 1 Jan 2014. They wish to apply for a 12 month extension from this proposal to complete the change to the new technology.	Issue to be considered by Associate Minister of Transport
3	Y012 (Motor Industry Association)	Industry representative group	Disagree	Ask that implementation to US 2007 standards is delayed until 1 July 2014, or 18 months from the date of signing of the Rule. This is because time is required between legislation being passed, and suppliers altering manufacturing processes.	Issue to be considered by Associate Minister of Transport
3	All others		Agree or did not comment		
4	All		Agree or did not comment		
5	Y013 (Bus & Coach Association)	Industry representative group	Further clarification necessary	<p>Further information to clarify the means by which a vehicle may be assessed as complying with an approved emissions standard. The proposed clarification does not set out specific information on what procedures and testing requirements are acceptable.</p> <p>They submit the Requirement for Urban Buses (RUB) is of a sufficiently high standard already, due to the fitment of Transport for London filters,</p>	No change required as it refers to in-service vehicles.

				<p>and so the proposed clarifications contain enough flexibility in allowing RUB requirements for emissions as an accepted standard.</p> <p>Also the proposed clarifications should provide enough flexibility so as not to hamper innovative emerging technologies that improve exhaust emissions.</p>	
5	All others		Agree or did not comment		
6	Y014 (AA)	Industry representative group	Agree in principle	But opposes the blanket exemption for 'immigrants' vehicles, and believes they should comply with the same standards as other used imports. However, they consider there be a provision in this Rule to issue individual exemptions on a case-by-case basis, where the vehicle owner or end user would experience unreasonable hardship.	No change required, out of scope. NZTA to note.
6	Y003 (VINZ)	Industry representative group	Agree in principle	Support the exception, but question the justification "other vehicle-related Rules" use a 20 year age limit (they can only note two Rules which do this). A single rule for standards implementation requirements would simplify things (i.e. Door retention, Seatbelt anchorages).	No change required, out of scope. NZTA Rules team to note for further consideration
7	All		Agree or did not comment		
8	All		Agree or did not comment		
Other Issues	Y012 (Motor Industry Association)	Industry representative group	Vehicle Tampering	Heavy vehicles complying to one or more emissions standards are being openly modified to bypass components of the emissions system, in order to reduce running costs. Tampering is becoming more prevalent, and required	No change required as out of scope. The issue deals with vehicles in service and not at time of

				components are openly advertised in trade (and on Trade Me). They believe the problem will only become worse with time.	entry. Propose that this is dealt with in the 2014 review
Other Issues	Y001 (Ministry of Health)	Government Agency	Vehicle Tampering	Are worried the proposed amendment does not appear to make it illegal to modify a vehicle's control equipment once it is operating on NZ's roads, which could worsen the vehicle's emissions.	Out of scope
Other Issues	Y004 (Emissions Solutions Ltd)	Business	Vehicle Tampering/in-service testing	Believe further clarification is required to ensure vehicles continue to be within emission standards throughout their life. They believe this requires a routine emissions test during a WOF. It is well known within the industry exhaust systems wear and catalytic converters fail. Emissions equipment is also removed by owners.	Out of scope
Other Issues	Y010 (Auckland Council)	Local government agency	Vehicle Tampering/in-service testing	Also recommend that government ensures existing vehicles in the fleet continue to meet emission standards, by requiring in-service emissions testing.	Out of scope
Other Issues	Y004 (Emission Solutions Ltd)	Business	Aging Vehicle Fleet/in-service testing	Feels the amendment is not going far enough for NZ's clean green image. Is worried about the old vehicle fleet, and that 72% of our vehicles are older than 2004 models (Rule introduction date). There is a need to tackle the older vehicles.	Out of scope
Other Issues	Y010	Local government agency	Aging Vehicle Fleet/in-service testing	Recommend the government reviews the vehicle fleet composition and develops policies to accelerate the scrappage of end of life vehicles.	Out of scope