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Ministry of Transport
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Wellington 6140

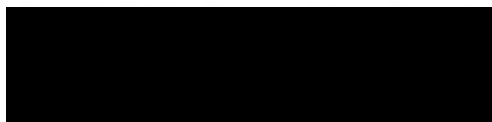
Feedback on the discussion paper on a Clean Car Standard and Clean Car Discount

Thank you for the opportunity for Auckland Regional Public Health Service (ARPHS) to provide feedback on the Ministry of Transport's discussion paper on a Clean Car Standard and Clean Car Discount.

The following submission represents the views of ARPHS and does not necessarily reflect the views of the three District Health Boards it serves. Please refer to Appendix 1 for more information on ARPHS.

The primary contact point for this submission is:

Dr Nicky Welch



Thank you for the opportunity to submit on this matter.

Yours sincerely

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Overview and Recommendations

1. ARPHS supports the Clean Car Standard proposal in principle because reducing transport CO₂ emissions, by increasing the number and proportion of electric vehicles and hybrids, should also improve air quality, which has potential health co-benefits.
2. The discussion paper notes that the New Zealand vehicle fleet is among the least energy efficient in the OECD. New Zealand's vehicle fleet is also relatively old with relatively poor exhaust emissions.
3. The recent New Zealand Transport Agency (NZTA) Research Report "*Testing New Zealand vehicles to measure real-world fuel use and exhaust emissions*", confirmed international findings that "vehicles on the road consume more fuel and produce higher exhaust emissions under real-world driving conditions than the values to which they are type approved when manufactured", even if there is no fraudulent manipulation of testing methods (as done by Volkswagen).¹
4. The "*Health and Air Pollution in NZ*" research study estimated over 250 premature deaths in 2006 from vehicle emissions, around two thirds of the road deaths that year.²
5. The Standard therefore needs to be formulated and implemented in such a way that it does not increase air pollution by increasing the number and proportion of diesel vehicles in the fleet. Diesel engines produce less CO₂ per km than petrol engines, but increase air pollution from oxides of nitrogen, ground-level ozone and particulates, with consequent health harm.
6. New Zealand must avoid the European situation where diesel vehicles were promoted in order to meet Kyoto Protocol requirements to reduce CO₂ emissions, but air quality worsened as a result. The situation was, of course, compounded by the fraudulent activity of diesel vehicle manufacturers (including Volkswagen) to manipulate emission testing procedures.
7. ARPHS recommends that, as part of implementing the Clean Car Standard, the Government:
 - Updates the emission standard for new vehicles in the *Land Transport Rule - Vehicle Exhaust Emissions (2007)* to the Euro 6 standard (or equivalent), which is already in use in Europe;
 - Updates the *Land Transport Rule* to Euro 5 standard (or equivalent) for imported used vehicles; and
 - Requires regular vehicle emission testing linked to Warrant of Fitness testing, and requires corrective action for high emitting vehicles.

¹ Kuschel, G, J Metcalfe, P Baynham and B Wells (2019) Testing New Zealand vehicles to measure real-world fuel use and exhaust emissions. NZ Transport Agency research report 658. <https://nzta.govt.nz/resources/research/reports/658/>

² Kuschel G et al (2012) Updated Health and Air Pollution in New Zealand Study. Volume 1: Summary report. Health Research Council of New Zealand, Ministry of Transport, Ministry for the Environment, New Zealand Transport Agency. <http://www.hapinz.org.nz/HAPINZ%20Update%20Vol%201%20Summary%20Report.pdf>

Conclusion

8. Thank you for the opportunity for ARPHS to provide feedback on the Ministry of Transport's discussion paper on a Clean Car Standard and Clean Car Discount.

Appendix 1: Auckland Regional Public Health Service

Auckland Regional Public Health Service (ARPHS) provides public health services for the three district health boards (DHBs) in the Auckland region (Counties Manukau Health, Auckland and Waitemata District Health Boards).

ARPHS has a statutory obligation under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities in the Auckland region. The Medical Officer of Health has an enforcement and regulatory role under the Health Act 1956 and other legislative designations to protect the health of the community.

ARPHS' primary role is to improve population health. It actively seeks to influence any initiatives or proposals that may affect population health in the Auckland region to maximise their positive impact and minimise possible negative effects.

The Auckland region faces a number of public health challenges through changing demographics, increasingly diverse communities, increasing incidence of lifestyle-related health conditions such as obesity and type 2 diabetes, infrastructure requirements, the balancing of transport needs, and the reconciliation of urban design and urban intensification issues.