

From: [REDACTED]
To: [Clean Cars](#)
Subject: Clean Cars Submission
Date: Tuesday, 9 July 2019 1:19:09 PM

Hi MoT,

The proposed clean car scheme only considers upfront cost and does not consider costs of ownership. Lower running costs are a key factor for lower income households.

If the current RUC regime is used this will penalise low emission vehicles as they pay the same cost as a gas guzzler per km while emitting much less pollution. Compare this with fuel taxing which penalises heavy fuel users. It will also favour PHEVs over EVs which will give a worse outcome in emission terms.

It is also possible under the RUCs regime that an efficient petrol car pays less than the cost of electricity plus RUCs for an EV.

Petrol car 5l/100km, fuel at \$2.20/litre = 12c/km

Electric car 5km/kWh, kWh at 30c = 6c/km. Plus RUCs at 7.2c/km gives 13.2c/km

I would like to see reduced RUCs for lower emission vehicles. RUCs should also be linked to weight in the same way the proposed emissions are as road wear is proportional to weight. A 3.5t truck does much more damage than a 1.5t car and RUCs should reflect this as replacement of roads uses a significant amount of oil products and CO2.

Kind regards,

Ben