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NZ Automobile Association submission on:
Hīkina te Kohupara – Kia mauri ora ait e iwi
Transport Emissions: Pathways to Net Zero by 2050



SUBMISSION TO: Ministry of Transport

REGARDING: Hīkina te Kohupara – Kia mauri ora ait e iwi Transport
Emissions: Pathways to Net Zero by 2050

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NOTE TO REQUESTOR:

The AA would be pleased to meet with the Ministry in response to this submission, and as further policy development takes place over the course of this year.

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Introduction

The NZ Automobile Association (NZAA/AA) appreciates the opportunity to comment on Hīkina te Kohupara – Kia mauri ora ait e iwi: Transport Emissions: Pathways to Net Zero by 2050.

As previously agreed with you, the AA plans to provide a further submission once we have received feedback from our 17 AA District Councils. The timing of their monthly meetings means we can't provide this feedback before the 25 June deadline.

The AA also hopes that our engagement with the Ministry will be on-going following the closing of submissions as many of the proposed options require further development and explanation. Government is not expected to make any final commitments until the end of the year.

Hīkina te Kohupara is a comprehensive document covering a broad range of transport proposals. It poses 13 questions to the reader.

The AA has chosen to limit our response to six questions only:

- **Q1:** Do you support the principles in Hīkina te Kohupara? Are there any other considerations that should be reflected in the principles?
- **Q5:** Are there other travel options that should be considered to encourage people to use alternative modes of transport? If so, what?
- **Q6:** Do you have any views on the role demand management, and more specifically pricing, could play to help Aotearoa reach net zero by 2050?
- **Q7:** Are there other possible actions that could help Aotearoa transition its light and heavy fleets more quickly, and which actions should be prioritised?
- **Q13:** Given the four potential pathways identified in Hīkina te Kohupara, each of which require many levers and policies to be achieved, which pathway do you think Aotearoa should follow to reduce transport emissions?
- **Q14:** Do you have any views on the policies that we propose should be considered for the first emissions budget?

Some context relevant to the AA's responses

- The past can give us a guide to the future. Over the last decade as our population has increased and economy grown, both vehicle kilometres travelled (VKT) and public transport (PT) trips have increased. Official projections are for both to continue to increase.
- It's worth noting that PT accounts for 2.5% of trips but a far greater percent of Government Policy Statement (GPS) funding goes to this mode, and this trend looks set to increase. As GPS funding for PT has increased more than threefold since 2017/18, this 2.5% share of trips has stayed constant (the overall number of PT trips increased). Similarly, for walking and

cycling big investments (a fivefold increase since 2017/18 in 2021/22) haven't changed the percent of trips this mode accounts for.

- So what's happening here? People are beautifully diverse – one type of transport cannot always be substituted for another (the term transport applies to a range of services and many are simply not close substitutes). With our small population compared to geographic area we would struggle to provide the heavy subsidies required to provide a viable PT service in all areas.
- Our road network is a big part of our transport system. With our small population compared to land area, it makes sense that 83.5% of trips are taken in private vehicles. So what does that mean – we need to look for solutions that address our problem, rather than going straight to solutions.
- One important consideration not well captured in this discussion is people's different circumstances, and what they need from the transport system. For example, private vehicles are indispensable for many people due to their location, health reasons or family commitments.
- While we support investments aimed at mode shift where these provide demonstrable transport benefits, investments into public transport and active modes cannot be an end in themselves, as these modes will not always "improve people's ability to get places" and be "fit for purpose transport for the future", which are intended goals of the GPS. We support an approach that chooses the best mode for the task at hand. That needs to be achieved through a transparent and balanced assessment process.
- Mode shift plans must be realistic about the potential for change, transparent, and deliver value for money. Plans need to be based on actual level of desire (not just the stated level of desire) to change modes, and an understanding of why people choose to live and travel the way they do.
- Therefore, the AA believes we shouldn't take an 'either or' approach to transport investment – the future is multimodal. We need a multimodal network. Buses, private vehicles, walking, mobility scooters, trains and bicycles, are all part of our collective past and future, as well as new ways of moving. We must improve the services they provide and reduce the harms they cause). As part of this we need a low carbon, safe, reliable, modern and efficient road network because people depend on it for work, learning, play and social connections.
- Decarbonising the road network is a challenge we are rising to and we must succeed. We need the road network to decarbonise. As this process continues, investment should promote decarbonisation in its many forms – EVs, ride sharing, biofuels, tackling congestion, safer speeds, and flexible infrastructure.
- The Government's recent decision to hypothecate ETS revenues for this purpose is a step in the right direction. Roads are a big revenue generator – they cover their own costs and the costs of others. Over the coming decade the money coming in from road taxes on fuel and

road use will reach close to \$50 billion. Road taxes have long covered the costs of road construction, maintenance, payed for road policing, subsidised PT services, and funded large portions of Waka Kotahi. No other mode is currently so self-sustaining.

- In addition, road users also pay ETS levy (currently \$560 million p.a.) capturing emissions costs. In the GPS, the challenge of the 'mode shift' strategy is essentially acknowledged through projections that over the next 10 years revenue from road users and road use will continue to increase. This brings us back to questions about the effectiveness of a 'build it and they will come' investment strategy without understanding what people want from the transport system and why they choose to travel the way they do.
- **The AA believes we must allow for innovation.** The GPS sets prescriptive goals for spending on specific modes (often ahead of meaningful analysis, evaluation, and solid cost estimates), combined with spending bands so tight that Waka Kotahi has lost much of the independence it once had regarding transport investments, which constrains innovation. We risk overlooking 'value for money'. Our transport system is constantly changing. Transport policies need to plan for and accept some uncertainty when considering the future of travel. This will enhance our ability to adopt and benefit from rapid advances in transport technology.
- In the AA's view, GPS 2021 needs to be revised with a stronger focus on technology and innovation to deliver an efficient, affordable and safe transport system with less environmental externalities. For this reason, we call for more investment in alternative fuels (e.g. biofuel), low and no emissions vehicles, demand management, shared mobility, mobility as a service, and research and innovation generally.
- The AA is concerned that Waka Kotahi's ability to make and fulfil decisions to build and improve roads has diminished considerably. The majority of current funding has been allocated to finishing projects already started and pay off debt. Without additional funding in later years most of the funding will be for paying off public private partnership debt in terms of roads with little for safety improvements.

AA response to Consultation Question 1:

Do you support the principles in Hīkina te Kohupara? Are there any other considerations that should be reflected in the principles?

Summary of AA views on:

- Principle 3: We need to take a strategic approach to reducing transport emissions so as to capitalise on short-term opportunities that will accelerate EV uptake, improved vehicle efficiency, reduce travel demand and investment in biofuels.
- Principle 7: Innovation and technologies will play an important role in reducing emissions, but people are the key to our future.

Discussion

Principle 3:

- The document proposes a series of changes to cities and infrastructure including reshaping our cities to improve the efficiency of the transport systems. It proposes using mixed urban development to reduce trip distances and encourage low emission transport options. With these options however, the pace at which change could be made is slow and they would have little impact on the first two periods of the Emission Reduction Plan (2022-2030).
- The principle prioritises initiatives that will capitalise on short-term opportunities and have the largest impact on avoiding and reducing emissions, while delivering value for society (including co-benefits). We have already seen over the past two GPS periods a move away from spending on road improvements to greater funding on non-road expenditure. However, we are yet to see the related benefits in emission reductions.
- The Climate Change Commission recently released report; Ināia tonu nei: a low emissions future for Aotearoa, identified the following as key to transitioning along its pathway to decarbonise transport. In the first budget period, for road transport their highest priority actions are:
 - i. Accelerating EV uptake
 - ii. Improving the average efficiency of internal combustion engine vehicles entering the fleet
 - iii. Reducing travel demand by remote working and switching to walking, cycling and public transport.
- The AA agrees with these recommendations

Principle 7:

- Principle 7 acknowledges that both existing and innovative technologies will keep changing the way people travel and the government can play a powerful role in accelerating the uptake of transport technologies.
- It's going to take time to transition to a low carbon environment. Hydrocarbon fuelled vehicles will still be in our fleet in 2050. A strategic approach would be to recognise this now and invest in low carbon fuels to power these vehicles. Therefore the AA is a strong proponent of investing in biofuels to lower the emissions from those vehicles still in the fleet.

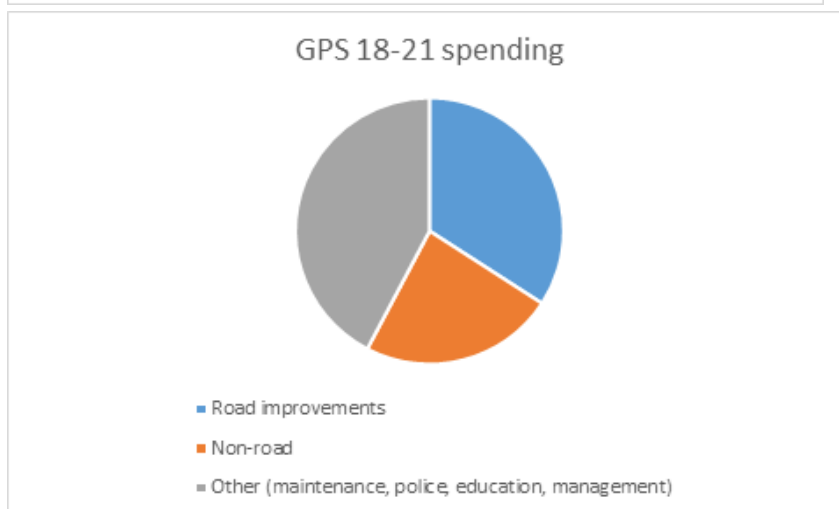
AA response to Consultation Question 5:

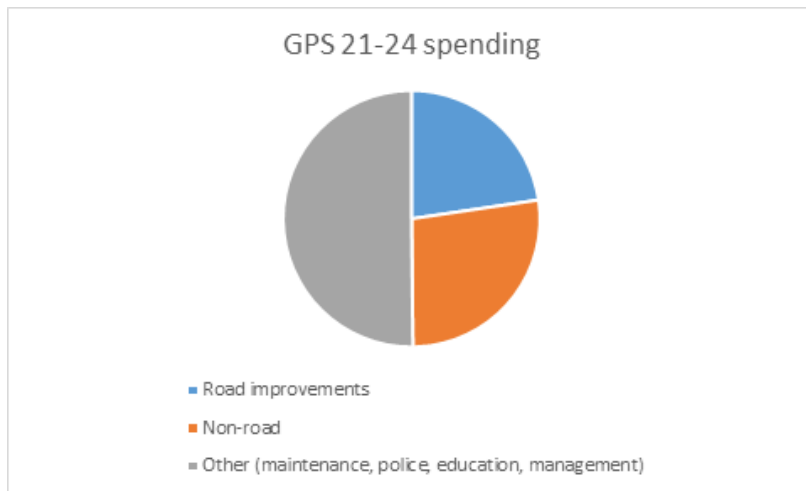
Q5 Are there other travel options that should be considered to encourage people to use alternative modes of transport? If so, what?

Discussion.

A key theme in Hikina Te Kohupara is to significantly increase investment in PT, walking and cycling in both a capital and an operational funding sense. The report suggests that “some investment is currently occurring though the GPS on Land transport, NZ Upgrade programme, and local government”

We have looked at the NZ GPS allocations for road improvements, Non-Road, and Other (maintenance, police, education, management) over the last 3 GPS periods (2015-2018, 2018-2021, 2021-2024). At this very high level, that expenditure is shown in the graphs below. This clearly shows that investment into “non-road” activity has grown considerable over this period, and roading improvements investment has fallen substantially.





In our view, the level of this change has been underestimated in the commentary on the issue. We now have a situation where road improvements are matched by non-road improvements. We do not consider that this is accurately described as “some” investment.

Furthermore, as we note at the beginning of our submission, we are yet to see this large change in funding begin to translate into mode share. We accept that this will take some time, however, we are of the view that at the level of investment being made we need to see a considerable reduction in emissions, and we want to see some very clear tracking of the changes that this investment produces.

It is also our view that there are opportunity costs to investments of this scale – what for instance would the same level of investment achieve if it was directed to biofuel or hydrogen development? To achieve the scale of change required – we need to invest in initiatives that will have significant, not marginal, impacts

AA response to Consultation Question 6:

Pricing is sometimes viewed as being controversial. However, international literature and experiences demonstrate it can play a role in changing behaviour. Do you have any views on the role demand management, and more specifically pricing, could play to help Aotearoa reach net zero by 2050?

Summary of AA views on demand management and pricing

- The AA is a cautious supporter of congestion pricing, but notes that significant public education is needed for it to be widely accepted.
- When introducing new demand management pricing initiatives, policies are needed to mitigate impacts on people/businesses who cannot use alternative transport modes.
- More investment in viable alternative transport modes is needed before substantial increases in fuel taxes are introduced.

- The introduction of low emission zones need to be carefully managed so as not to exacerbate congestion in other areas.

Discussion

Congestion Pricing

- Often policies to incentivise behaviour change are linked to pricing in the belief that motorists will react rationally to these signals. Also, pricing often generates revenue and over time this revenue becomes attractive when pressure is placed on funding. Hīkina te Kohupara proposes the use of congestion pricing as one method of changing motorist's behaviour.
- Congestion pricing is intended to improve traffic flows and travel times as well as achieve emissions reduction by dis-incentivising road users from travel during times when travel is at its highest demand. The purpose is to encourage users to travel at different times or routes or shift to alternative methods of travel. Where it has been able to be implemented (which to date we note is in a very limited number of cities around the world), congestion pricing has been proven to have a positive impact on reducing congestion and emissions.
- New Zealand's six largest metropolitan areas (Auckland, Wellington, Christchurch, Hamilton Tauranga and Dunedin) experience 20-31% average extra travel time at peak times due to congestion. The first two areas, Auckland & Wellington, would appear to be the only realistic candidates if congestion pricing was introduced due to limited egress points and high traffic flows.
- The AA has closely followed the discussion around road user charges (in their different forms) in Auckland for the last decade, and has been one of the most vocal contributors to the public debate. The AA has been fully engaged in the work that the Ministry has been leading in this area. A report on congestion pricing in Auckland (the Congestion Question) was released last year and it makes a compelling case for congestion pricing in Auckland as well as practical suggestions for delivery.
- Our position is that we are a cautious supporter of congestion pricing and recognise the potential benefits it offers, but that Members have concerns about affordability and the impact on those least able to afford it. This is challenging territory and we encourage further work, and further engagement.
- While the AA cautiously supports congestion pricing, we note that a survey of Auckland and Wellington AA Members shows us that congestion charging is simply not popular in the cities where it could be feasibly applied. Less than 10% of Members surveyed thought a daily charge of \$8 a day (or more) was acceptable. Also, a large proportion of respondents thought they could avoid a congestion charge by navigating around it. The most popular avoidance strategy is to use roads not included in the scheme, which was cited as a strategy people believed they would use by 74% of Aucklanders and 61% of Wellingtonians.

- In conclusion, AA Members remain sceptical about the idea of congestion pricing, both because of the impact it could have on them personally, and the impact it could have on other members of society. Yet they are desperate to see more done to address Auckland's stifling congestion (congestion is far and away the number-one transport concern for Auckland AA Members), and they recognise that solutions will require changes in the way we behave as transport users (including, potentially, how much we pay). There are signs that, if the benefits justified the additional cost, AA Members would be willing to consider it.

Increase rates of fuel excise after 2023

&

Implement an increased transport fuels only carbon tax

- The AA is concerned that significant price increases would have to apply to FED, RUC, ETS or any new transport fuel tax to achieve the level of ambition the Climate Change Commission seeks in Ināia tonu nei: a low emissions future for Aotearoa. This is due to the elasticity of petrol in New Zealand which is estimated at around -0.15, which means that when the price goes up by 10%, we'll only buy 1.5% less.
- The AA is aware that there has been research into how price changes affect transport activity. These include changes to fuel pricing, distance changes, tolls, parking fees and public transport fares. Other considerations are the frequency and quality of the services provided in relation to the price of that travel.
- Transport pricing will have varying impacts between urban and rural areas. In urban areas the ability to mode shift will be more accessible while in rural areas this will not be the case. Price increases on business travel would have little impact on changing behaviour and is less sensitive as it will be seen as a cost of doing business and an operating expense to be passed on.
- This is not the case for private travel or motorists who are required to commute to and from their workplaces. Also, the wealthy are less likely to be affected as they have more discretionary income, while this is the opposite for low income drivers. This suggests that too big an increase in charges, in whatever form, will be seen as a regressive tax.
- The AA believes that to achieve the best outcomes, first investment must be made in alternative modes of transport so that there are available options prior to the introduction of what may be seen as punitive pricing measures. The challenge will be to provide these options in an affordable way, especially in smaller provincial areas. For this reason, the AA supports investment in alternative transport modes servicing urban areas because there are bigger gains to be made. As Hikina te Kohupara points out, there are much more limited options in provincial and rural New Zealand. In these areas sufficient investment must be made into our current road network to maintain good levels of service, and we must see alternative fuels invested in (including EVs, biofuels, hydrogen) so that provincial communities and business can continue to be mobile.
- The AA is not opposed to price increases where the additional revenue is allocated to viable, alternative transport options, and where investments show good value for money in

reducing emissions. We caution, however, that without viable policies to change behaviour, purchase more efficient vehicles, or generate mode shift, then pricing will be primarily a revenue gathering policy as opposed to a behavioural change policy.

Low emission zones

- The AA acknowledges that low emission zones create more liveable and pleasant urban environments if the design is well executed. This creates spaces for safer and cleaner walking, cycling and public transport use. Their creation is part of changing the way we travel and the intensification of population densities in our cities.
- However, authorities still need to convince a significant proportion of the public that these investments will be improvements. While Wellington City Council's re-design of the "Golden Mile" into a walking, cycling and public transport-only corridor was touted as being broadly supported by the Wellington public, AA surveys indicate there is a significant proportion of the public that are still sceptical of the benefits. The new design will remove parking spaces and private vehicle access, while allowing commercial transport in to service businesses at restricted times. In our annual survey of AA Members concerns around transport earlier this year, 50% of Wellington respondents said they were often annoyed by parking availability in and around the CBD. This was the second highest level in the country, behind only Otago.
- One possible consequence of a well-executed low emissions zone could be that people undertake additional travel to these areas as attractions. It is accepted that most travel into the Wellington CBD is workers commuting to and from their places of employment. But it is not implausible that an attractive low emissions zone draws in extra vehicles to the fringes that would not have previously been attracted to the area.
- Therefore, providing for increased travel to these areas in a low/zero emissions way would be important.
- We believe that more consideration should be given to the treatment of areas on the fringes of these zones and that in the current absence of available, timely and cheap public transport options to the low emission zones, parking spaces / buildings be provided. We advocate the further expansion of EV charging points into these spaces to further incentive low emission transport options. In our annual survey, half of Wellington respondents said they were annoyed by parking availability in and around the CBD.
- Low emissions zones also risk pushing people onto arterial roads, aggravating congestion problems on these roads. We are yet to see any modelling of how this may work in Wellington for example, despite the "ban" already being announced. This is another reason why fringe areas around low emissions zones need careful consideration.

AA response to Consultation Question 7

Improving our fleet and moving towards electric vehicles and the use of sustainable alternative fuels will be important for our transition. Are there other possible actions that could help Aotearoa transition its light and heavy fleets more quickly, and which actions should be prioritised?

Summary of AA view on key priorities

- The AA agrees with the principle of a transport biofuels obligation and more investment is needed to reduce emissions across the existing fleet.
- We support the introduction of the Clean Car Discount and the Clean Car Standard.
- More should be done to incentive fleet buyers to increase the uptake of low emission vehicles (eg. tax credits and accelerated depreciation).

Discussion

- The AA welcomes the 2021 budget announcement that commits the Government to hypothecating revenue from the ETS to implementing emission reductions. Currently, \$560 million p.a. of ETS revenue is received from FED contributions. At a minimum, an equal amount of this revenue should be hypothecated to transport emission reduction programs. In fact, acknowledging that transport is recognised as low hanging fruit for emission reductions, the AA believe there is a strong case for more money than the current amount be allocated.
- The AA supports the goals of recently enacted emissions reduction policies, but still has some scepticism about their achievability within the timeframes aspired to, and concerns that they will unfairly penalise people who cannot adapt or afford alternative transport options.
- The AA previously raised concerns when the initial Clean Car Standard and Clean Car Discount was first proposed that the rate of change proposed by the policy was far too ambitious. The penalties were too high, especially as they appeared to impact the most popular vehicle models and this would lead to increased vehicle cost for motorists.
- Since then, the Government has agreed to reduce the initial penalties to around half of what was originally proposed, although they will increase over time. The AA is still concerned that low availability of low emission cars, especially EVs, even with strong price signals from both the Clean Car Standard and the Clean Car Discount, will force consumers to have to pay penalties.
- The AA agrees with the principle of a transport biofuels obligation as we already have the infrastructure to store, transport and distribute liquid fuels, we just need to incentivise investment in production.
- The \$41.8m allocated for government agencies to lease low-emission vehicles does not go far enough to make a noticeably fast enough transition in our vehicle fleet. More policies directed at fleet buyers are needed to increase the uptake of low emission vehicles. Recent

Budget announcements will fund the transition to EVs in some government departments, but this is small scale. It is acknowledged that the Clean Car Standard and Clean Car Discount will influence fleet buyers and grants are available via EECA and loans from the NZ Green Investment Finance bank, although these grants and loans will not be of use to most small fleets. Because 70% of new vehicles entering the fleet are sold to fleet buyers, these ultimately end up in private ownership so strong incentives are needed to encourage private fleet owners to purchase low emission vehicles.

- Policies such as tax credits and accelerated depreciation have been proven successful when implemented in other countries. To date these have not been seriously investigated in New Zealand. Fleet vehicles usually end up in private ownership so any policy that incentivises uptake of low emission vehicles, then accelerates their entry into the general public fleet, is to be encouraged.

AA response to Consultation Question 13

Given the four potential pathways identified in Hīkina te Kohupara, each of which require many levers and policies to be achieved, which pathway to you think Aotearoa should follow to reduce transport emissions?

Summary of AA view on the best pathways

- Start investing in urban form now, with a value for money lens, and no expectation of quick change.
- Investigate, with plenty of public education, smart use of distance and congestion pricing (using policies that minimise the impact on low income households and businesses who cannot change their travel mode).
- Invest more in biofuel development.
- Pathway 2 is the most realist with elements of Pathway 1

Discussion

- To achieve the emission reductions in Theme 1, the theme expects the introduction of congestion pricing, parking pricing, and vehicle-kilometres-travelled distance pricing in 2025. The AA considers that this is far too optimistic a timeframe. Member surveys show that the driving public needs much more information on the benefits that congestion pricing will bring before they are over the line on supporting it.
- Both distance and congestion pricing could offer significant changes to the way land transport revenue is obtained. These pricing options have the potential to be regressive, impacting most on low income households.
- Recent announcements by the Government on introducing the Clean Car Standard and funding the Clean Car Discount complement Pathway 2. However, other than the anticipated biofuels mandate, there are few other initiatives aimed at accelerating the uptake of biofuel.

- In all four pathways, improving efficiency and introducing low carbon fuels will be essential for reaching the zero-carbon target by 2050. The government has introduced the Clean Car Standard to improve the efficiency of new light vehicles entering the fleet. The recently introduced Clean Car Discount will further reduce the price difference between ICE powered vehicles and more expensive EVs but only if there is sufficient stock of used EVs in Japan that can be imported cost-effectively into New Zealand, and unfortunately EV stock does appear to be well below anticipated global demand.
- The policies are premised on the belief that EVs will be readily available in the future and that price parity between ICE and EVs will occur mid to late this decade. The AA has some concerns that this will not be the case due to demand for EVs from left-hand drive countries and manufacturers supplying that market. Also, we know that post-COVID there have been shortages of semi-conductor chips leading to manufacturing constraints.

AA response to Consultation Question 14

Do you have any views on the policies that we propose should be considered for the first emissions budget?

Summary of AA views on policies for the first emissions budget:

- The AA recognises that changes to urban form can have an impact on emissions, although benefits won't be seen until later budget periods. We want to see a strong value for money lens applied to show that these changes will be effective in making significant reductions in emissions.
- The AA believes more policies that incentivise fleet buyers to transition to low/no emission vehicles are needed.
- The AA believes there is opportunity to invest more in biofuel as a transitional technology to reduce emissions across the whole light vehicle fleet.

Discussion

- It is important that more is done to improve existing and future communities to facilitate low emission transport systems. The allocation of road space and the design and implementation of low traffic zones will take time – both because of engineering/building constraints and also where there is opposition to these changes and other proposals to intensify population density. These changes require the social licence of the inhabitants populating the cities as many would be impacted by the loss of parking, the slowing of traffic speeds and the perception their mobility will be compromised.
- The pace at which these changes will be made is slow and they would have little impact on the first two periods of the Emission Reduction Plan (2022-2030). Therefore the AA believes that although starting on this should occur in the first emission period it does not expect to see the benefits until later budget periods.

- The AA would like to see more done to incentivise fleet buyers to purchase low emission vehicles, accepting that the Clean Car Discount will offer some assistance.
- Also our light fleet is still more than 98% ICE powered. The Government need to consider increasing the use of biofuels as the infrastructure to store, transport and distribute liquid fuels already exists and only the production of biofuels requires additional investment.

Further Discussion

The AA would be pleased to meet with the Ministry in response to this submission, and as further policy development takes place over the course of this year.

About the New Zealand Automobile Association

The NZAA is an incorporated society with over 1.75 million members, representing a large proportion of New Zealand road users. The AA was founded in 1903 as an automobile users' advocacy group, but today our work reflects the wide range of interests of our large membership, many of whom are cyclists and public transport users as well as private motorists.

Across New Zealand, the motoring public regularly come into contact with the AA through our breakdown officers, 37 AA Centres and other AA businesses. Seventeen volunteer AA District Councils around New Zealand meet each month to discuss local transport issues. Based in Wellington and Auckland our professional policy and research team regularly surveys our Members on transport issues and Members frequently contact us unsolicited to share their views. Via the AA Research Foundation, we commission original research into current issues in transport and mobility. Collectively, these networks, combined with our professional resource, help to guide our advocacy work and enable the NZAA to develop a comprehensive view on mobility issues.

Motorists pay over \$4 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. Much of this money is reinvested by the Government in our transport system, funding road building and maintenance, public transport services, road safety work including advertising, and Police enforcement activity. On behalf of AA Members, we advocate for sound and transparent use of this money in ways that improve transport networks, enhance safety and keep costs fair and reasonable.

Our advocacy takes the form of meetings with local and central government politicians and officials, publication of research and policy papers, contributing to media on topical issues, and submissions to select committees and local government hearings.

Total Membership

1.75+ million members



Just over 1 million are personal members

0.75 million are business-based memberships

% of licenced drivers

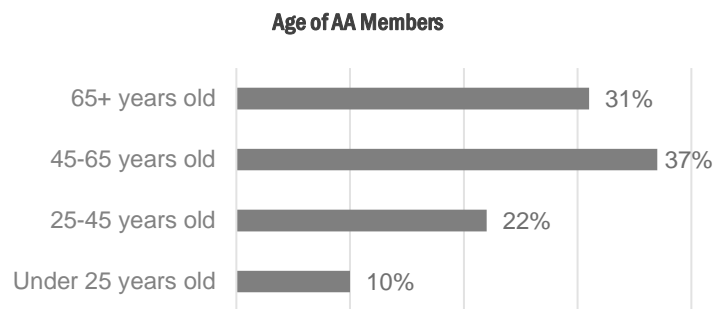
Half of licenced drivers are AA Members

Gender split

54% Female

46% Male

Age range & Membership retention



Half of AA Members have been with us for 10 years or more.
