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Te Manatū Waka
Ministry of Transport
Wellington

Submission on the Land Transport Rule: Vehicle Exhaust Emissions 2007

1. The NZ Automobile Association (NZAA) appreciates the opportunity to comment on the Land Transport Rule: Vehicle Exhaust Emissions 2007. The NZAA has over 1.8 million Members.

Submission

2. This submission concentrates on two matters that we believe may impact the availability and cost of vehicles; and possible impacts on the classic motorcycle restoration industry.

Vehicle Standards

3. In general the NZAA is supportive of the introduction of more stringent exhaust emission standards for new and used vehicles. We note the introduction of the proposed standards will lead to a significant long-term reduction in nitrogen oxides, exhaust particulates and carbon monoxide in both the light and heavy fleet.
4. However, the NZAA is not as confident as the Ministry that the introduction of the Euro 6d standard for light vehicles, before it is introduced in Australia, will not lead to some form of market disruption. The New Zealand new vehicle import market is treated by many manufacturers as a branch of the larger Australian market, making up 15% of the Australasian market. If new vehicle manufacturers must test vehicles to different standards for the two markets - New Zealand and Australia - then it is highly likely that these costs will be passed on to importers and ultimately consumers. If the additional cost of compliance to the Euro 6d standard is only borne by New Zealand importers then the costs of testing to this standard will be spread amongst fewer purchasers, resulting in higher costs per unit (because New Zealand is only 15% of the Australasian market).
5. The NZAA position is that the introductory dates of the Euro 6d standard for new vehicles should be aligned with the introductory dates for the standard in Australia.
6. In contrast, the NZAA strongly supports the introduction of stricter exhaust emission standards for used vehicles. The Euro 5 standard was first introduced internationally in 2009. Therefore, vehicles as old as 15 years could be imported after the standard is implemented in February 2024. The average age of cars in New Zealand is just over 14 years.
7. The NZAA understands the need to balance exhaust emission improvements with vehicle availability and cost. We therefore support policy interventions like Euro 5 for used vehicles, and

other policies that have lesser impacts on availability and affordability, but still stop the importation of old, polluting vehicles into New Zealand.

Motorcycle Exemptions

8. The NZAA is also worried that that the introduction of emission standards for motorcycles may result in an unintended consequence. New Zealand has an international reputation for the restoration of classic vehicles including classic motorcycles.
9. The proposed rule change introduces exhaust emission standards for motorcycles for the first time. The Principle Rule; Land Transport Rule Vehicle Exhaust Emissions 2007 Rule 33001/2007 currently states;

2.2(3) *This clause does not apply to:*

- (a) immigrants' vehicles; or*
- (b) Class MA special interest vehicles; or*
- (c) mobile cranes; or*
- (d) vehicles specified in paragraph (a) of the definition of 'low volume vehicle' that comply with the emissions requirements of the Low Volume Vehicle Code*

10. The proposed exemptions for motorcycles include:

- (e) military vehicles; or
- (f) enduro motorcycles (as defined in Land Transport Rule: Light-vehicle Brakes 2002); or
- (g) farm motorcycles (as defined in Land Transport Rule: Light-vehicle Brakes 2002); or
- (h) special interest motorcycles (as defined in Land Transport Rule: Light-vehicle Brakes 2002); or
- (i) trial motorcycles (as defined in Land Transport Rule: Light-vehicle Brakes 2002).

11. Enduro, farm and trail motorcycles are easy to define. The NZAA is worried about the definition of special interest motorcycles being that described and covered by the Land Transport Rule: Light-vehicle Brakes 2002. This definition severely restricts the importation of classic motorcycles to an individual being allowed only one application for one bike every two years and allows only 100 special interest permits to be issued in any one calendar year.

12. The NZAA believes that this could have the unintended consequences of limiting the commercial activities of classic motorcycle restorers and recommends that provisions be included to allow for classic motorcycles to be imported for the purposes of restoration and sale.

Conclusions

13. The NZAA has appreciated the opportunity to provide input on the Land Transport Rule: Vehicle Exhaust Emissions 2007. We hope the issues we have raised above are addressed in redrafting of the Rule. We would welcome the opportunity for further involvement in this process, as useful, to ensure a better outcome for all road users.

Yours sincerely

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