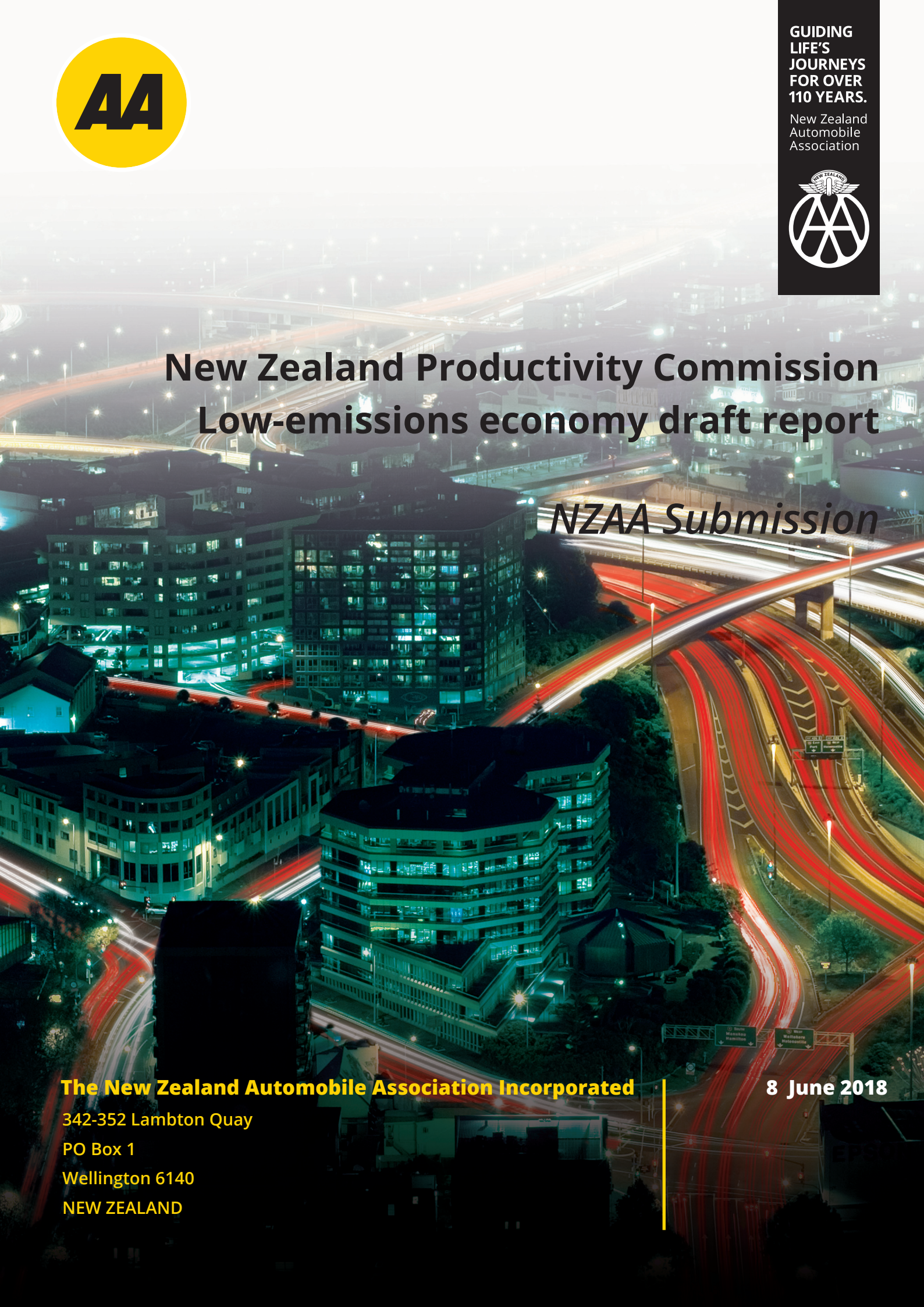
GUIDING LIFE'S JOURNEYS FOR OVER 110 YEARS.
New Zealand Automobile Association

New Zealand Productivity Commission Low-emissions economy draft report

NZAA Submission



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NEW ZEALAND

8 June 2018

Submission To:	New Zealand Productivity Commission
Regarding:	**Low-emissions economy**
Date:	8 June 2018
Attention:	Low-emissions economy inquiry
Address:	New Zealand Productivity Commission PO Box 8036 The Terrace Wellington 6143
Submission Authorised By	Simon Douglas National Manager, Policy and Research New Zealand Automobile Association Incorporated P.O Box 1 Wellington
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Note to Requestor	The AA requests an opportunity to present this submission in person as part of the engagement process.

Contents

Introduction

The New Zealand Automobile Association is pleased to make the following submission in response to the New Zealand Productivity Commission's draft report into a transition to a lower-emissions economy.

In terms of our response, we have not set out to address all the issues raised, but have confined our comments to areas in which we have experience and sector expertise, and where that can also be shaped by our extensive Member surveys. Where our submission is confined to Auckland, we believe it could have practical application nationally if / when necessary.

Content of this Submission

Background on the New Zealand Automobile Association

The NZAA is an incorporated society with 1.6 million Members. Originally founded in 1903 as an automobile users advocacy group today it represents the interests of road users who collectively pay over $3 billion in taxes each year through fuel excise, road user charges, registration fees, ACC levies, and GST. The NZAA's advocacy and policy work mainly focuses on protecting the freedom of choice and rights of motorists, keeping the cost of motoring fair and reasonable, and enhancing the safety of all road users.

The NZAA sees itself as having a role to play and an essential voice when discussing a transition to a lower-emissions economy, specifically in the transport sector. The Association's transport expertise is supported by regular NZAA surveys of its Members that provide significant insights into the patterns, practices and needs of transport users across New Zealand.

Executive Summary: transitioning to a low-emissions economy

The Productivity Commission (the Commission) has identified a number of draft recommendations on how New Zealand can maximise the opportunities and minimise the costs and risks of transitioning to a lower net-emissions economy in order to meet these goals. The Commission now seeks feedback on the recommendations from a variety of sectors that attribute to New Zealand's emissions.

The NZAA is hugely supportive of measures to reduce New Zealand's emissions and to begin the transition to a low-emissions economy, and our previous response to the Commission outlined some of our own policies that reflect this. However, the Commission indicates in this report that successfully phasing out fossil-fuel vehicle imports would go a "long way" to helping New Zealand meet its long-term emissions-reductions goals. The NZAA submits this is not quite the case: it will go some way, but must be seen in light of the total emissions this country produces. Emissions from light-vehicle transport account for 12% of greenhouse gas emissions1, and there must be other avenues contemporaneously sought (as illustrated by the Commission's report) to reduce the national figure. We commend the Commission for identifying some of these other avenues and not seeing transport as a silver bullet that will radically change New Zealand's emissions profile.

The NZAA is also conscious that education of and consultation with the public is essential when making recommendations that drastically affect how have the potential to significantly change New Zealander's mobility. As an organisation, the NZAA has undertaken significant survey work to understand how and why our Members travel the way they do and we are wary of any recommendations that affect that without already having a level of support from New Zealanders. Understanding New Zealanders mobility preferences and behaviour, and educating and consulting with the public should be at the forefront of any of the Commission's recommendations, and we have identified this as missing in this draft report. We urge the Commission to consider this aspect in its final report.

Given the NZAA's wide reach with its 1.6 million Members and broad survey capabilities, we are in a position to advise the Commission on the following:

- Issues surrounding and the feasibility of a vehicle fuel economy standard;
- Any potential feebate system;

[1]See Ministry of Transport's 2016 Vehicle Fleet Statistics, available https://www.transport.govt.nz/assets/Uploads/Research/Documents/Fleet-reports/The-NZ-Vehicle-Fleet-2016-web.pdf. The light passenger fleet reflects 64.8% of vehicle emissions, there 11.7% of New Zealand's overall emissions profile.

- Investment of government funds into EV charging infrastructure;
- A government EV fleet
- Congestion charging and the surrounding policy and regulatory environment;
- Broadening the scope of the GPS on Land Transport;
- Phasing out of fossil fuel vehicles in New Zealand;
- Flexible working arrangements as a means to reduce congestion (emissions)
- Members' views on climate change and the price of carbon

About our **Members**

Age, gender, location, vehicle ownership

With more than 1.5 million Members, the AA is New Zealand's biggest club.

Our Members come from every part of the country and right across New Zealand society – from teenagers learning to drive to Members who have been with the AA for more than 60 years.

Slightly more women than men are AA Members and we have hundreds of thousands of Members who, as well as being car drivers, also use public transport, bicycles and motorcycles.

AA Members tend to be slightly older and more well off than the general population but because we have such a large number and range of Members our surveys give a great picture of what New Zealanders think about transport issues.

17%

have children in their care

14%

describe themselves as a cyclist

11%

regularly use public transport

AA Members are voters

86%

said they would be voting in the last local body elections

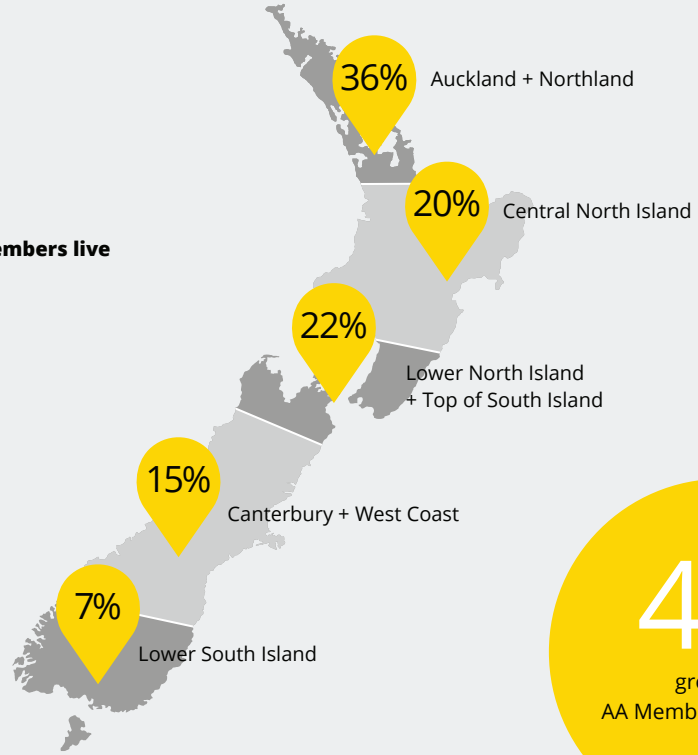
54%

of AA Members are women

50%

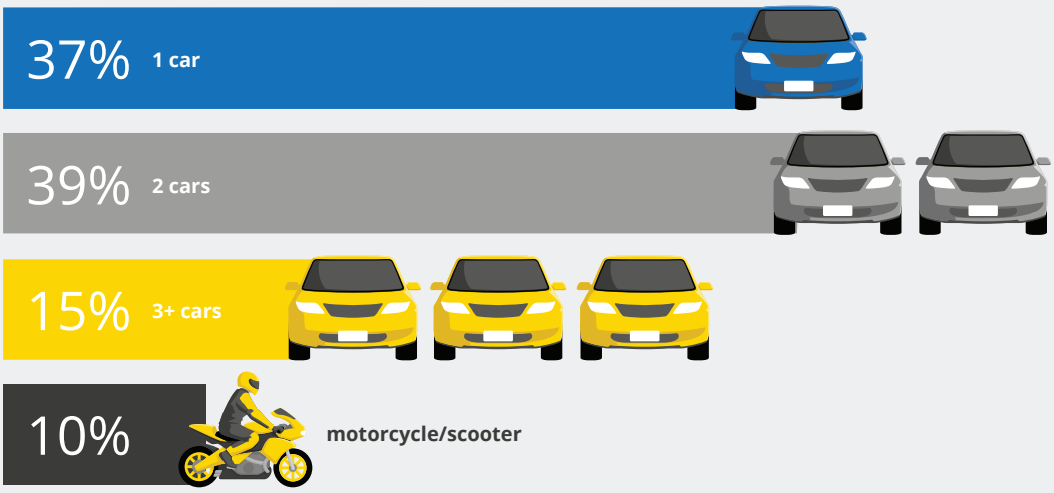
of AA Members are younger than 55

Where our Members live



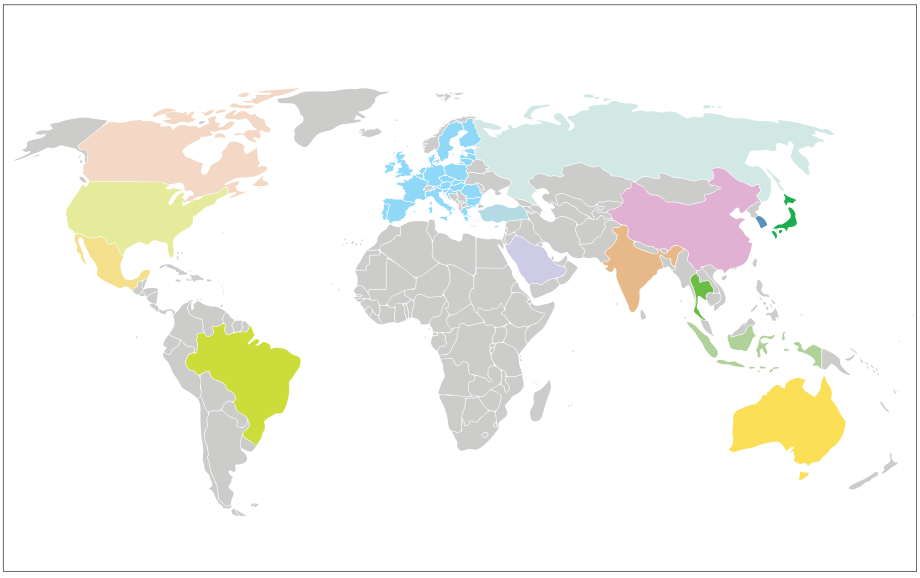
4%
growth in
AA Membership in 2016.

Vehicles per household



Responses to the Commission's transport-related **questions**

Recommendation 11.1: ***The government should introduce CO2 emissions standards for light vehicles entering the New Zealand fleet, subject to detailed consideration of design options (for example, including or excluding small traders).***



Currently, 10 of the top 15 vehicle markets globally have mandatory fuel economy standards for passenger vehicles, with a number of developed countries also having implemented schemes.

New Zealand's main sources of new and used cars[2] into the country all have some form of fuel economy standard. These standards now cover two thirds of the world's largest vehicle markets and 80% of the new vehicles sold globally.

New Zealand, however, has no such scheme in place. In 2009, the (then) New Zealand government prepared a cabinet paper detailing the feasibility of a vehicle fuel economy standard (VFES) to match international efforts in this space. The (then) Minister of Transport determined a VFES would not go ahead on the basis that there had been a voluntary trend towards the purchase of smaller vehicles in the new car market, partly triggered by the high fuel prices of 2008, and that it would significantly increase costs to the sector which was already struggling as a result of the Global Financial Crisis.[3]

[2] Though there is no universal standard. The countries are: Japan, the EU, UK, Singapore, Australia, South Korea and the USA.

[3] See Cabinet Paper, "Vehicle Fuel Economy Standard" 2010, https://www.transport.govt.nz/assets/Uploads/Our-Work/Documents/Vehicle-Fuel-Economy-Standard-Cabinet-Paper-Aug-09.pdf

At the time, factoring in similar concerns of our Membership, the NZAA's policy position aligned with the Minister's decision. However, given New Zealand's propensity towards buying bigger vehicles over the last decade (with the number one selling car a Ford Ranger)[4] and more vehicle kilometres travelled higher than ever,[5] this NZAA position may need reassessing. The NZAA has more recently publicly made calls for a real world emissions testing standard[6] given the concern growing over recent years – particularly as the divergence between real world and official laboratory tested emissions increases.[7] The NZAA's concern is the growing disparity compromises the *actual* benefit of fuel standards and undermines its legitimacy.

While the NZAA is supportive (in principle) of a VFES, significant analysis is needed for designing a solution, which would need to take place in conjunction with the industry, as the Commission has identified in its draft report. Industry feedback may focus on the international scope to cheat the system – for instance, reclassification of a large passenger vehicle as a light commercial vehicle in order to avoid the stricter onus on passenger vehicles. Commercial vehicles and the heavy fleet must also be brought into the scheme to effect real change and prevent sidestepping the system.

Finally, the NZAA wishes to see a universal, standardised scheme established globally to ensure accurate comparisons are being made – the US and Canada have the led the way on this.[8] Any VFES would also need to work in conjunction with complementary policies, for instance a feebate system as detailed below. The result would be more New Zealanders aware of the fuel efficiencies of any prospective vehicle they purchase, with the clear dis/benefit from a bespoke feebate system to influence their buying decision.

Recommendations to the Productivity Commission:

- Consider global compliance with international standards a more pressing priority given New Zealand's lack of manufacturing and small market
- Consideration of VFES should be following analysis of New Zealand fleet and in conjunction with industry experts

Recommendation 11.2: ***The government should introduce a price feebate scheme for vehicles entering the fleet, subject to identifying the most suitable design features for the New Zealand context. The feebate scheme should replace the existing road-user charge exemptions for light EVs.***

The feebate system provides the government with another policy lever to reduce vehicle emissions, increasing EV uptake and the uptake of more fuel efficient ICE vehicles. The Commission has investigated the possibility of a fleet average emissions feebate system. It has found that the effective design of a feebate scheme is critical to its success – we agree.

One of the issues the Commission sees as requiring further consideration is the coverage and treatment of different vehicle types. It suggests that an option is to have separate schemes for different vehicles classes. This is in line with the NZAA's initial submission to the Commission.

[4] See https://www.nzherald.co.nz/business/news/article.cfm?c_id=3&objectid=11972532

[5] See https://www.transport.govt.nz/resources/tmif/transport-volume/tv001/.

[6] See "The AA: Towards an Efficient, Less Polluting Transport System", http://pureadvantage.org/news/2017/11/30/aa-towards-efficient-less-polluting-transport-system/

[7] Real world versus official emissions from new vehicles in the EU have increased from 8% in 2001 to 40% in 2014. This trend has been seen in the US, Japan, and China also.

[8] See the 2017 Global Update "Light Duty Vehicle Greenhouse Gas and Fuel Economy Standards", p 7 at https://www.theicct.org/sites/default/files/publications/2017-Global-LDV-Standards-Update_ICCT-Report_23062017_vF.pdf. Canada has harmonised with the USA's 2016 and 2025 requirements.

Recommendations to the Productivity Commission:

- Any feebate system needs to be carefully designed and all permutations should be assessed. We recommend the development of a feebate scheme to be completed in close consultation with the vehicle sector in order to design the most equitable and effective scheme to meet the objectives

Recommendation 11.3: ***The government should provide financial support for charging infrastructure projects to support the uptake of EVs. Support should be limited to specific gaps in the charging network that are not commercially attractive to the private sector (eg. charging stations in lowly populated regions).***

The NZAA supports government providing financial support for charging infrastructure projects to support the uptake of EVs. Our Members currently lack confidence that the charging infrastructure required when owning an EV is not available with the regularity of a petrol station should they require recharging. Studies over the last decade have suggested that visible recharging stations in the community have a positive effect on intentions to purchase an EV, and would help with the rapid uptake the Commission suggests is required to transition to a low-emissions economy. Such government initiatives to provide incentives to build charging infrastructure to drive the sales of EVs would see it sit alongside international governments like South Korea, Belgium, Germany, Canada, USA, and Mexico.

While we are supportive of this recommendation, the NZAA suggests the Commission should proceed with caution in its advice to the government. The NZAA submits there should be a business case to support the investment in infrastructure, particularly in the lowly populated regions. There needs to be concrete evidence that the proposed benefit will outweigh the cost, with modelling to show much investment will support the achievement of the outcome of increased uptake of EVs. Given the current limited travel range of EVs, it is likely that these lowly-populated areas will be far from local amenities, meaning an EV may not be fit for purpose yet. While only 3% of AA Members drive over 50 km from home a few times a year and can feasibly use an EV most days of the week, there are still those that cannot and will not. Increased charging stations will do little to help that particular group given charging time and travel distances they need to cover; the impracticalities will not make this a viable option for this number – yet.

Further information available:

NZTA's project, EVROAM, of which the NZAA is a foundational supporter, may be able to provide the required data needed to serve the business case here. EVROAM is NZTA's live database of all of New Zealand's electric vehicle charging infrastructure. EVROAM collects information from all the safe and monitored charge points in the country as live data, and freely distributes it to the NZAA for use in its Time and Distance Calculator. This maximises the profile of the available charging infrastructure though dozens of existing apps and maps, letting drivers know if a station is operational or otherwise offline so that they can plan journeys. It will be launched in June / July 2018. We suggest the Commission notes this in its final report to the government as it will likely enable better understanding of the resilience of the charging infrastructure across the country and what further efforts are required.

Recommendations to the Productivity Commission:

- Any charging infrastructure investment decisions should be well supported by a business case
- Look to already established projects like EVROAM to provide the data necessary to support the business case

Recommendation 11.4: ***The government should encourage government agencies where practical to procure low-emission vehicles.***

The NZAA is supportive of the Labour and New Zealand First coalition agreement which seeks to have the government vehicle fleet emissions free by 2025/26 (where practicable). The Minister for Climate Change, Hon James Shaw, has also supported this move saying that he is committed to encouraging the use of EVs, and believes the Crown car fleet can be electric powered by 2025.[9] Similarly, the Associate Minister of Transport, Hon Julie-Anne Genter, has suggested the support for EVs comes from not only the environmental benefits, but the reduced ongoing running costs, making them a good investment for government departments.[10] We have attempted to determine how many vehicles are in the New Zealand (central) government fleet to determine how many could be electric by 2025. We have been unsuccessful, and ask the Commission to look into this figure.

If the government is to procure EVs on the basis of good investment, with a by-product of growing the second-hand EV fleet in New Zealand, motorists need to see that buying EVs second-hand stacks up financially. The NZAA is currently preparing its own total cost of ownership for EVs as it does for ICE vehicles – though this is not yet publicly available.

The current NZAA ICE total cost of ownership model is the only one in New Zealand that also factors in depreciation, as will the EV model. EVs currently have a high depreciation that will see their used price fall below the cost of battery replacement given high replacement costs.[11] While we see this likely to change with technological advances, it is still something to consider for our Members in the short term.

Recommendations to the Productivity Commission:

- The NZAA is supportive of this recommendation, but cautions the Commission on high depreciation costs of EVs in the second-hand market

Recommendation 11.5: ***The government should take steps to amend the pricing system for transport so that a greater share of the external costs associated with private vehicle use are internalised. For example, the government should work with councils to enable and encourage the use of road pricing tools to reduce congestion and emissions in main urban centres.***

Specific measures to target congestion, like charging, are seen as opportunities to reduce emissions and transition to a low-emissions economy. However, these measures, if brought in without education, consultation and acceptance from motorists would simply be seen as a penalty to motorists rather than pro-active attempts to encourage behavioural change. This might include educating New Zealanders about their future mobility (for instance, the total cost of owning and driving a car, and whether this is feasible for the next generation). The NZAA submits that there needs to be more balanced focus and education of motorists on the actual costs of transport compared with what they pay. This must occur before any kind of

[9] Please refer to the NZAA Wellington congestion infographic attached.
[10] The morning peak is defined as 7am – 9am.
[11] See NZAA, "Buying a used electric vehicle", 8 September 2017: https://www.aa.co.nz/cars/motoring-blog/buying-a-used-electric-vehicle/.

policy implementation can take place, and will ensure better public buy-in.

NZAA Members' views on Congestion Charging

One third of the NZAA's Auckland Members agreed that the government should immediately consider congestion charging – as long as the benefits were visible. When London implemented its central area congestion charging scheme in 2003 the city saw a 20% reduction in four-wheeled traffic within the charging zone during charging hours, cutting an estimated 40-50 million litres of vehicle fuel consumption inside the zone and a total 100,000 tons of CO2 emissions annually across London. It also raised an NZ equivalent $239 million annually to be spent on improving public transport infrastructure and implement energy efficiencies in transport.[12]

Broader scope

The NZAA's advice to the Commission is to be part of a broad and honest discussion on all of the wider issues impacting on transport - the how and why people are driving; and not just on the congested streets of Auckland and Wellington, but across the country. There is no one silver bullet that will solve congestion; congestion charging should be seen as a tool alongside appropriate investment in transport infrastructure and a focus on using the network most efficiently. For instance, AA Members use and will continue to use a private motor vehicle to get to work or play because of the speed, convenience, and reliability of their own car, and because public transport is not yet a viable or convenient option for them.[13] The point of congestion charging isn't to remove all vehicles from the network in any case, but to get the right amount of people to shift travel time or mode to enable the traffic to flow more efficiently.

There must be other policy levers pulled by government to ease congestion (and therefore emissions) and still provide the option to use a private motor vehicle when it is needed. Other cities around the world have recently published their own investigations into this issue. The recently released Metro Vancouver Mobility Pricing Study refers to 'mobility pricing' as a range of fees that could be applied for the use of transportation services, indicating the user of other levers. The examples cited are car insurance, bike sharing fees, parking fees, fuel taxes and transit fares.[14] The 'decongestion charge' - as Vancouver refers to it - is simply a form of mobility pricing. This broad perspective was guided by the Mobility Pricing Commission's objectives of reducing traffic congestion, fairness for all transport users, and supporting transportation investment in Vancouver for all users.

The outcome of Infrastructure Victoria investigation into a pricing regime[15] was to focus on all aspects of mobility pricing options – not simply road. It focused on how Victorians are travelling, noting that communities have a preference for personal mobility. NZAA research would also suggest this is true in New Zealand, and is something that must be considered for our own congestion question. The report also found that an efficient network has some congestion during peak hours and in heavily travelled areas, as the cost of investment in transport services is too high relative to the benefits from reducing congestion. Perhaps we must accept that a congestion free network is not possible, nor desirable, which should impact the

[12] See C40 Cities, "London Congestion Charge Cuts CO2 Emissions by 16%" at http://www.c40.org/case_studies/londons-congestion-charge-cuts-co2-emissions-by-16.

[13] Around two thirds of AA Members say that even with a congestion charge of up to $5, they will still continue to drive because they need to.

[14] See study here: https://www.itstimemv.ca/uploads/1/0/6/9/106921821/mpic_full_report_-_final.pdf, released on 24 May 2018.

[15] See study here: http://infrastructurevictoria.com.au/sites/default/files/images/The%20road%20ahead%20final%20web_0.pdf. Released November 2016.

direction Auckland takes in determining its own pricing structure.

Finally, the NZAA is very aware of the need for change, and our Members tentatively support congestion charging.[16] However, ideological solutions will not solve the problem for us, and preparing policy in a vacuum will be of no help long-term. By no means is the NZAA advocating for the status quo, but congestion charging must not be seen as the ultimate solution; it is merely a tool in a toolbox and should be seen in the context of a broader picture.

As referred to in our previous submission to the Commission, we reiterate our suggestion of other practical alternatives like consideration of smart parking initiatives, uptake of Intelligent Transport Systems (ITS) to optimise transport, increased uptake of park and ride, incentivising rideshare, and network optimisation measures to reduce congestion and emissions.

Recommendations to the Productivity Commission:

- Understanding of how and why New Zealanders travel is a vital first step before making any suggestion of changing their travel habits
- Consultation and education of the public must come first before any steps are taken to internalise the cost of congestion
- Behavioural change must be seen as a part of a long-term education campaign – cars will not be taken off the roads immediately with an imposed cost penalising motorists
- Other levers must also be considered in tandem

Recommendation 11.6: ***The government should make emissions reductions a stronger strategic focus in transport investment. This should include changes to the GPS on Land Transport to broaden its scope to cover the whole land transport system and make the transition to a low-emissions economy a strategic priority.***

NZAA Members are supportive of emissions-reducing transport like light rail, particularly in urban areas.[17] The NZAA is also a strong supporter of EVs and our previous submission to the Commission indicated we support them as a means to reduce the environmental footprint of the land transport system. However, the NZAA has concerns that this type of broader scope policy position towards the transport system now reflected in the draft GPS on land transport 2018 (GPS) does not adequately consider the dwindling NLTF should there be a large-scale reduction in tax-paying motorists. Should the uptake of low-emission vehicles increase substantially, we note there will inevitably be a shortfall in funding to the NLTF which will need to be addressed in future policies from the government and reflected in the GPS. If this is a strategic priority that will be formally adopted by the next iteration of the GPS, then the future funding system for transport as a whole must be reassessed.

The government will be producing a second version of the GPS in mid-2019, and we have already highlighted concerns to the Ministry in an official submission on the GPS. The NZAA supports the signals to invest in lower-emissions modes of transport or transport systems and increasing the uptake of active modes. However, the NZAA submits emphasis should be on providing New Zealanders with real alternatives to the car that are fit for purpose, rather than penalising New Zealanders who do not have viable mobility options and have no control over the environmental footprint of the preferred mode.

[16] See NZAA, Auckland Matters, Issue 7: Congestion Charging. Around two-thirds of Auckland AA Members say they're open to congestion charging either now or in the future.

[17] Some 77% like the sound of the Government's goal to improve urban rail services, GPS Member survey, April 2018

Recommendations to the Productivity Commission:

- Understanding of how and why New Zealanders travel is a vital first step before making any suggestion of changing their travel habits
- Consultation and education of the public must come first before any steps are taken to internalise the cost of congestion
- Behavioural change must be seen as a part of a long-term education campaign – cars will not be taken off the roads immediately with an imposed cost penalising motorists
- Other levers must also be considered in tandem

Questions from the Productivity Commision

11.1 ***How could New Zealand signal a commitment to a widespread transition away from fossil-fuel vehicles? For example, should New Zealand explicitly aim to phase out the importing of fossil-fuel vehicles by some specified future date?***

New Zealand is typically a technology taker, primarily due to our smaller market and lack of vehicle manufacturing, and because of this it may not be necessary for New Zealand to commit to a firm date for the phase out of fossil-fuel vehicles. Our key source markets, identified above, are likely to commit to phasing out 100% ICE vehicles based on international and domestic regulatory pressure. The vehicles brought into this country will then follow whatever electrification and ICE phase out path is set by other markets. This will, of course, mean that New Zealand's approach will be delayed, but it is very difficult to set a specified date given our dependence on other markets.

If New Zealand was to implement some sort of phase out date before our key markets (for instance our largest source market, Japan), it is likely this would have negative consequences for the age and safety of the fleet, as New Zealanders would hold onto their existing vehicles for longer, and with newer vehicles typically being safer as technology develops. Because of this, the NZAA submits the Commission should not recommend a specific phase out date, until after our main source markets have begun to phase out 100% ICE.

Therefore, we suggest any possible phase out of 100% ICE should follow the same precedent as that adopted for vehicle emissions standards in the Vehicle Exhaust Emissions Rule. This sets the minimum exhaust emissions standards that all vehicles entering the fleet must meet before they operate on New Zealand roads. This Rule phased in the adoption of the latest international emissions standards (e.g. Euro 5), following their implementation in source countries. In the case of new vehicles, the adoption of the latest standard typically lagged the source market by a few years, whereas for used-imports the lag was around 8 years to reflect their older age. We suggest a similar principle could apply to phasing our new and used ICE vehicles respectively.

Further **Matters**

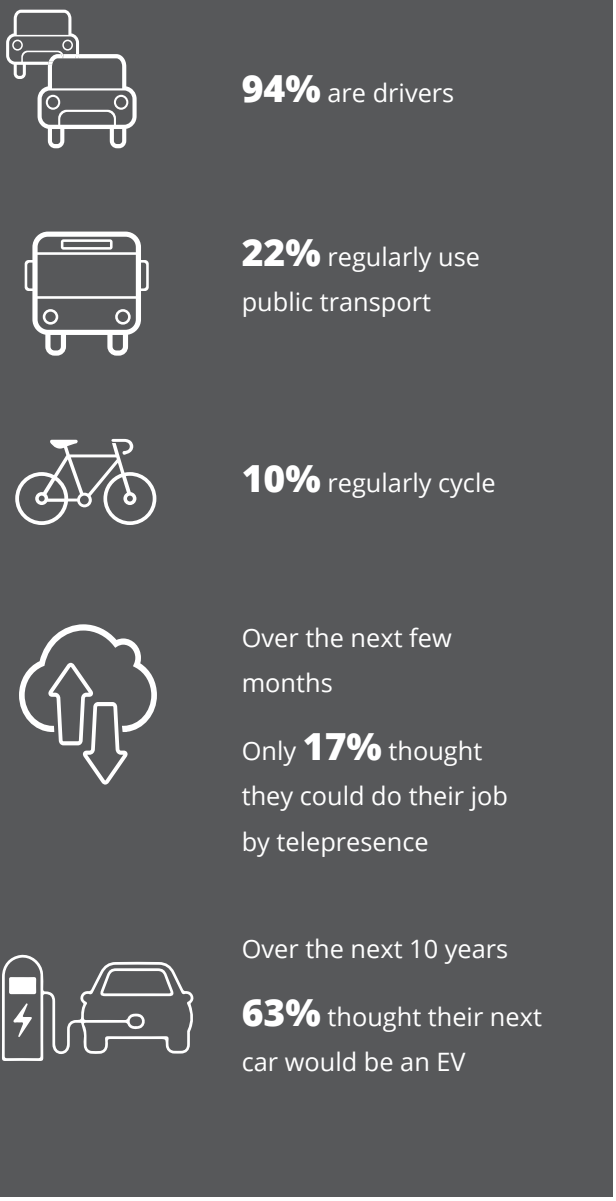
In our previous submission to the Commission, we advised we would be surveying our Members on their attitudes towards climate change and flexible working arrangements as a means to reduce congestion. We are in a position to brief you on our Members' views now.

Climate Change

We regularly survey our Members on their attitudes to transport and the environment. In our last What Members Think, we established that 88% of our Members were environmentally conscious, but only 31% of them were able to make changes to their travel for environmental reasons. As well as that, only 5% of our Members would find it 'no problem' if they couldn't use a car. This provides conclusions on how New Zealanders travel and what they want from a transport system. Our Members are using their cars because a public transport system doesn't cater to them at all, or can't cater to their personal needs - and they currently don't need or want to compromise on that.

Carbon Emissions

To dive deeper into what our Members views are on climate change, we surveyed some approximately 1,200 Members in November 2017, advising them on the Paris Agreement and New Zealand's obligations under it. We attempted to determine AA Members' enthusiasm about the climate change cause; how AA Members are willing or able to change their transport practices to meet our Paris climate change targets; and how AA Members will respond to increased costs of carbon if the ETS settings are changed.



There was little faith that New Zealand would meet its climate change targets, and even less faith that the rest of the world would.

For self-identified environmentalists, they would on average pay $30 a month in the way of climate tax in an attempt for NZ to reach its climate targets. On average, this group pays around $43 a week in petrol.

Again, if we use self-identified environmentalists as our example, a 25% increase in petrol would cause on average, 40% of those environmentalists to "probably" change mode to using public transport. This suggests that even when faced with growing emissions, higher fuel prices as a result, that 60% of them are still in a position where they want or *need* to drive.

Flexible Working Arrangements:

As indicated in our original submission to the Commission, we are investigating the potential benefit of flexible working arrangements as a means to reduce congestion. To reiterate, in Portland, Oregon, with a population comparable to Auckland, working from home has taken more cars off the road than any other mode since 2000.[18] We wanted to see what the scope was for Aucklanders to do similar.

The NZAA surveyed nearly 2,000 of its Auckland Members that commute regularly during peak hours[19] and assessed their knowledge of their organisation's flexible work arrangements policy. While section 69AA (Part 6) of the Employment Relations Act 2000 provides employees with a statutory right to *request* a variation of their working arrangements, 40% of survey respondents claimed that their employer did not make flexible work hours or working from home available. Another 43% stated that it was applicable in 'certain circumstances'. However, when asked if their job could still be done if encouraged to change hours to avoid commuting within peak hours, almost half said this was possible. There was also overwhelming support and interest in working flexible hours or working from home to avoid peak traffic, with nearly 90% of respondents claiming they would like to. According to our data, survey respondents had made just over 1,000 requests to their employers for flexible work arrangements[20]. We did not obtain quantitative data on how many of these individual requests were accepted, but instead sought qualitative data on the approach received from employers. This ranged from a satisfying accepted result, to the worst case scenario where the request was laughed at and refused.

This survey allows us to make several statements concerning flexible working arrangements, and some that we will need to explore further with road

[18] Since 2000, Portland has seen 23,063 people adopting flexible working practices by working from home.

[19] We defined peak as between 6.30am and 8.30am in the AM and 4.30 – 6.30 in the PM.

[20] We included the following options: working any time of day so it added up to full time hours, compressed working weeks, non-standard shift arrangements, non-standard break arrangements, transition periods, job sharing, part year work, alternating locations and other.

controlling authorities to develop.

Highlights:

- There are real barriers to implementing flexible work policies: some of these are workplace cultural issues, some are technical issues, and some are simply impossible due to the nature of the work
- Auckland congestion is getting AA Members down, with the majority saying they'd achieve a better work life balance and save time travelling if they could use flexi-time
- Most people are happy to work in their regular environment – they just want to avoid the peak traffic
- Working from home one day a week was a high-ranked option to avoid some of the traffic

The NZAA is looking at working in conjunction with Auckland Transport to determine if, based on our survey results, we can make any policy recommendations in this space. In the meantime, we draw the Commission's attention to a further potential policy avenue to reduce congestion, and therefore emissions, in this transition to a lower-emissions economy.

End of submission

[20] We included the following options: working any time of day so it added up to full time hours, compressed working weeks, non-standard shift arrangements, non-standard break arrangements, transition periods, job sharing, part year work, alternating locations and other.

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