TE MANATŪ WAKA
MINISTRY OF TRANSPORT

Summary of submissions on implementing the Euro 6/VI emissions standards

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Executive Summary

The draft Land Transport Rule: Vehicle Exhaust Emissions Amendment 2023[1] (the amendment Rule) and the accompanying discussion documentation were released for public consultation on 11 May 2023. The deadline for submissions was 22 June 2023. We received a total of 77 submissions via email or online via our consultation hub:

- 34 from **private individuals**.
- 23 from the **vehicle industry** including:
    - 5 from **advocacy bodies** being the Vehicle Industry Association (VIA)[2], the Motor Industry Association (MIA), the Motor Trade Association (MTA), the National Road Carriers Association, and Ia Ara Aotearoa;
    - 7 from **national and international vehicle manufacturers** including Toyota, Scania, Isuzu and General Motors, Isuzu Heavy Vehicles, Ford, Harley Davidson, and Mitsubishi;
    - 5 **new and used vehicle importers** including Daimler Truck Australia Pacific, Paul Kelly, Fast Track Cars, Red Stag, and Japan Direct;
    - 2 **vehicle shipping companies** including Autohub and Dolphin Shipping;
    - 2 **vehicle engineering and technology companies** being Cummins, who manufacture diesel and alternative fuel engines and generators, and related components and technology and SOC NZ Ltd. who certify the standards of European market vehicles imported into New Zealand; and
    - 2 **vehicle adaptations and modified vehicle hire company** for disabled people being Freedom Mobility Ltd. and Vehicle Adaptions Ltd.
- Four from **local government agencies** and two from **central government agencies** being Hamilton City Council, Greater Wellinton Regional Council, Bay of Plenty Regional Council, Otago Regional Council, Te Whatu Ora Health, Ministry of Business, Innovation and Employment (MBIE).
- 13 from **community groups, NGOs, health, and advocacy bodies,** being Nelson Transport Strategy Group (Nelsust Inc.), National Air Quality Working Group (NAQWG), Automobile Association (AA), Disabled Persons Assembly, Living Streets Aotearoa, OTRS Rehabilitation Services Occupational Therapist (Disabilities), The International Council on Clean Transportation (ICCT), Trafinz (NZ Traffic Institute), Consumer, Healthy Auckland Together (Auckland Regional Public Health Service), Spokes, Cycling Action Network.

We also held five online workshops, each themed around groups of stakeholders:

- 6 June - Requiring Euro VI for heavy vehicles.
- 8 June - Requiring Euro 6 for light vehicles, motorcycles, and mopeds.
- 12 June - The impacts of implementing the Euro 6/VI emissions standards on health and air quality.

[1] This draft Rule amends Land Transport Rule: Vehicle Exhaust Emissions 2007.

[2] Autohub, Dolphin Shipping Paul Kelly, Fast Track Cars, and Red Stag all supported the VIA's submission.

- 15 June - Requiring Euro 6 for vehicles modified for disabled people.
- 16 June - The impacts of implementing the Euro 6/VI emissions standards on equity.

This detailed summary of submissions:

- Outlines the key themes and issues raised in the written and online submissions and information sessions.
- Outlines Te Manatū Waka Ministry of Transport's response to the key themes and issues raised, and the proposed changes to the Rule.
- Provides a question-by-question summary of feedback received, including workshop content where relevant.

Summary of issues raised and responses

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
Eight submitters stated that we should align with Australia on the dates and stages of the implementation of Euro 6/VI to avoid restricting new vehicle supply and to minimise increases in vehicle prices and compliance costs.	Te Manatū Waka has considered either progressing the amendment Rule's phase-in or aligning with Australia. Aligning has the potential to forego a net benefit of around $322–$334 million in avoided health harm. However, we have not been able to quantify how much of this value will likely be eroded by the supply and price risks submitters identified. Given the uncertainty and the relatively limited additional benefits from moving sooner, we recommend aligning with Australia.	Euro 6d be required for newly approved light vehicle models from 1 July 2025 or 1 July 2027, depending on the date chosen by the Australian Government, rather than on or after 1 February 2025 Euro 6d be required for new existing light vehicle models from 1 July 2028 rather than on or after 1 February 2026 Euro VI-c would remain the exhaust emission standard for heavy vehicles on or after 1 November 2026 rather than strengthening to Euro VI-e at that date. This may be reviewed in future subject to changes in other jurisdictions.
Multiple submitters, other than from the vehicle industry, the AA, and the majority of road freight operators, stated that various proposed implementation dates, for different vehicle classes, for the rule should be brought forward to maximise health benefits for New Zealanders.	Te Manatū Waka has considered the benefits of bringing it forward, but consistent with the issue above, on balance, considers that the potential risk of bringing implementation forward may have a greater impact on the supply of vehicles.	No change.
Two submitters stated that heavy vehicles sourced from European markets will be required to meet a higher standard compared to heavy vehicles complied to the US or Japanese standards, which would create an uneven playing field from 1 November 2026.	Given the standard applying to heavy vehicles is the most critical to reducing health harm, it will be desirable to reconsider the heavy vehicle standard for the post 2026 period when the Japanese and United States' standards, currently equivalent to Euro VI-C, strengthen to be equivalent with Euro VI-E.	As above, the move from Euro VI-C to Euro VI-E will not be included in the rule and is subject to future decisions.
Two submitters stated that the requirement for Real Driving Emissions (RDE) tests is unnecessary and will create uneconomic trade barriers for manufactures to supply New Zealand.	The Euro 6/VI emission standards have proven to be effective in reducing the large discrepancy between the level of emissions emitted when vehicles are tested under laboratory conditions, and the much higher level when driven in the real-world. This is why they are considered to be the global benchmark. Of the Euro 6/VI stages, the most effective ones are the latter stages that use RDE tests as part of type approval. The testing of vehicles in real-world driving conditions has forced manufacturers to improve vehicle emissions control systems.	No change.
Two submitters stated that the requirement for In Service Conformity (ISC) testing should be exempted in New Zealand as	ISC testing is a key reason for why the Euro 6/VI standards have proven more effective than their predecessor standards. ISC testing is done on in-service vehicles that	Two clarifications would be added stating that:

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
there are no testing facilities capable of performing this type of testing.	have been driven for around 100,000 kilometres. The testing assesses the durability of vehicle emissions systems. It has led to improvements in these systems. We appreciate the concern the Motor Industry Association has raised that if test vehicles must be supplied from New Zealand, or if the testing must be conducted within New Zealand, the costs could be prohibitive. We have sought to find a solution that allows New Zealand to benefit from ISC testing, while minimising costs. In our view the option that best does this is to: • state the expectation that irrespective of the regulation certified against, a vehicle must continue to meet emissions limits for its useful life (which is specified in overseas regulations and is usually around 100,000 kilometres). • allow ISC testing to be undertaken overseas, in the country of manufacture, or in one of the larger vehicle markets.	• irrespective of the regulation certified against, a vehicle must continue to meet emissions limits for its useful life (which is specified in overseas regulations and is usually around 100,000 kilometres) • ISC testing can be conducted using overseas vehicles and test facilities.
One submitter disagreed with the proposed comparisons of European standards with standards from other jurisdictions as set out in the consultation documentation. They presented an alternative proposal that compared and aligned emission standards from multiple jurisdictions, based on the estimated amount of potential health harm it caused in dollar-terms.	Te Manatū Waka have reviewed the alternative comparisons of European standards with standards from other jurisdictions. The proposal is inconsistent with the wider approach to vehicle emissions, both in New Zealand and overseas. While there may be merits for future consideration, there is no intention to make such a substantial change at this point in time.	No change.
One submitter requested that the weaker Japanese emissions standard Japan 2005 (including CXX) should be used instead of Japan 2005 Low Harm for petrol vehicles, that the weaker Japan 2005 emission standard should be used for diesel vehicles instead of Japan 2009, and that Japan 2018 Low Harm includes additional codes.	Te Manatū Waka disagrees with the view that weaker Japanese standards should be recognised for used imports, as these standards would effectively maintain Euro 4 in 2024, rather than strengthening to Euro 5, and Euro 6d would not be reached in 2028.	No change.
Two submitters sought a 24-month minimum notice period prior to its adoption of new emissions standards, due to production planning timeframes, to avoid restricting new vehicle supply and to	We appreciate the concern that new vehicle distributors raise that it can take up to 2-years to adjust the vehicles they are supplied with by their overseas manufacturers.	Addressed in the above changes.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
minimise increases in vehicle prices and compliance costs.	The decision to align with Australia will provide the time new vehicle distributors require.	
Two submitters representing disability vehicle importers and users stated that the draft Rule's date for imported used-disability vehicles to be Euro 6d of 1 January 2028 will increase transport disadvantage because it will limit supply of the most common disability vehicle to newer models that tend to be more expensive.	This issue arises because the Toyota Hiace Welcab, currently the most cost-effective vehicle for people needing wheelchair assistance, only started being manufactured to the Japan 2018 standard for the Japanese domestic market in 2020. If we require this standard from 1 January 2028, people who can not afford new vehicles face the financial challenge of buying a used-import Hiace Welcab that is 8 years old and younger[3]. We appreciate the concern raised by the Disabled Persons Assembly that the expense of newer vehicles will be too challenging for people who are not eligible for ACC funding. Modified vehicles that disabled people buy are typically 10–12 years old. While some people receive Lottery grants of up to $40,000, successful applicants would need to contribute an additional $5,000–$25,000 to purchase a vehicle. More importantly, only one-third of the applications for Lottery grants for disability vehicles are successful. Although the Land Transport Act 1998 allows for case-by-case exemptions to emissions standards, this process is unlikely to mitigate the risk of Euro 6 increasing transport disadvantage. Primarily this is because the exemption criteria Waka Kotahi use includes having a successful application for Lottery Grants funding.	To avoid further entrenching transport disadvantage, we recommend extending the date for imported used-disability vehicles to be compliant with Japan 2018 from 1 January 2028 to 1 January 2031. This would ensure compliant 11-year-old vehicles would be available to buy in 2031.
Two vehicle industry submitters stated that mopeds should be exempted to avoid the availability of low-cost moped/scooter models being impacted by the introduction of these emissions standards, and that it was unlikely to be re-engineered just for the New Zealand market.	Te Manatū Waka disagrees with these views, which conflict with other available information. Mopeds in major markets like the United States, China, Brazil, Japan, India, Indonesia, and the European Union are subject to exhaust emissions standards. We also understand that New Zealand's supply of motorcycles and mopeds is not tied to the Australian market as it predominantly is for new light and heavy vehicles.	No change.
Two vehicle industry submitters stated Border Inspection should be permanently used as the point of compliance, for used imports, when vehicles are approved to enter New Zealand and relevant	For **used** vehicles having border inspection as the point of compliance would help minimise the financial impact delays can have in the weeks prior to new emissions standards coming into effect. As border inspection can occur overseas it is particularly helpful in minimising the impact of shipping	"Border inspection" would be adopted as the point of compliance, rather than when a vehicle is "certified for entry into service". This amendment would change the existing practice and is being made in response to feedback from the vehicle industry.

[3] Four to six year old Hiace Welcabs sell for around $45,000 to $65,000 depending on their condition.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
information is entered into the Landata system. The proposed Rule offered this be the case for a short number of months following the new Rule being adopted.	delays. Shipping delays can render vehicles that were compliant with an existing standard, when purchased in Japan, to be non-compliant with a new standard and blocked from entry. To reduce any abuse, a requirement would be needed that border inspection is no longer valid if performed more than four months prior to entry certification. The replaced clause 6.1 would need to reflect this amendment.	Tables 2A, 2B, 2C, and the replaced clause 6.1 would need to be amended to reflect the change.
Three submitters proposed that date of manufacture be used as the point of compliance, for new heavy and light vehicles, instead of date of certification for entry into service.	Te Manatū Waka agrees that is preferable to maintain the status quo compliance point.	For **new** vehicles: "Date of manufacture" would be adopted as the point of compliance, rather than "certified for entry into service". Tables 2A, 2B, 2C would need to be amended to reflect this change.
One submitter highlighted that vehicle age is a useful indicator of vehicle specification and technology and noted New Zealand's older than average fleet (average age 15 years), proposing that introducing a rolling age ban for used vehicle imports could address multiple outcomes.	We agree that vehicle age is a useful indicator of vehicle specification and technology. However, a rolling age ban goes beyond the scope of this policy proposal to strengthen the exhaust emissions standards so is not proposed for adoption.	No change.
One submitter stated that the definition of "Higher Standard" in the draft rule illustrated the bias the Government has in favouring European standards over emissions standards from other jurisdictions. It stated that the definition of "Higher Standard" should be changed to reflect the desire for an improved level of achievement in a standard (as defined by an increased reduction in harm) as opposed to the chronological order of implementation.	Te Manatū Waka notes that there is some subjectivity or differences in view across whether particular emissions standard achieves reduced levels of harm or not, which makes it complex to definitively identify whether one standard is "better" than another from an emissions perspective. However, standards of all countries tend to improve incrementally over time, so in most cases chronologically	No change.
One submitter sought to retain older vehicles using the early Japanese test standard (J10/15 testing procedure).	Te Manatū Waka disagrees with the view that weaker Japanese standards, with weaker testing procedures, should be recognised for used imports. These standards would effectively maintain Euro 4 in 2024, rather than strengthening to Euro 5, and Euro 6d would not be reached in 2028.	No change.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
One submitter sought increased support for low and middle-income New Zealanders to transition to cleaner vehicles and remove high emitting vehicles from the fleet.	Te Manatū Waka acknowledges the need for policies that create an equitable transition and to consider how high emitting vehicles can be exited from the fleet earlier. However, this extends beyond the scope of this policy proposal to strengthen the exhaust emissions standards.	No change.
One submitter stated that early adopters of Euro 6/VI are effectively being penalised under the Clean Car Standard and Clean Car Discount schemes due to the vehicles being subjected to more rigorous testing requirements.	Te Manatū Waka notes that the Clean Car Discount and Clean Car Standard schemes do not take into account a more accurate real-world base measure which could potentially be significantly higher than it would be for a lower emissions standard for equivalent vehicles. This is beyond the scope of the current rule, but Te Manatū Waka will provide advice for consideration by Ministers in 2024.	No change.
30 submitters stated support for the introduction of Euro 6e and Euro 7 and 20 submitters stated support for the introduction of Euro VII as part of the amendment Rule.	Given the risks of increasing standards on the availability and supply of vehicles, Te Manatū Waka does not propose to include the implementation of Euro 6e and Euro 7/VII in the updated Rule. Te Manatū Waka will provide further advice on implementing Euro 6e and Euro 7/VII in the future.	No change.
Eight submitters disputed benefits of Adopting Euro 7/VII.	Te Manatū Waka support the view that the introduction of Euro 7/VII would be beneficial for New Zealand because it will introduce stricter emissions limits, for light and heavy vehicles, which will help to significantly reduce emissions from diesel vehicles and introduce requirements for electric vehicles.	No change.
One submitter stated that New Zealand fuel quality standards must be updated before the introduction of Euro 6d.	To address this, the Engine Fuel Specifications Regulations 2011 will need to be amended, before Euro 6d becomes mandatory, to lower the permitted aromatic levels in petrol from 45 percent to 32 percent. The responsibility for progressing this amendment sits with the Ministry of Business, Innovation and Employment, and is due to happen before the final introduction of Euro 6. This does not require an amendment to the Rule.	No change.
One submitter requested an exemption for 'access to vehicle repair and maintenance information' as included in the definition of Euro 6d in the amendment Rule. It stated that there is currently no formal process for vehicle importers to provide public access to repair manuals and technical service information.	The Euro 6 phase-in proposal inadvertently included access to vehicle repair and maintenance information because it repeated the text of UNECE and EC regulations. However, it is a matter that is outside the scope of the proposal. This will be clarified by amending the definitions of the regulations.	A clarification will be added to the Rule as the UNECE regulations do not contain some features of the EC regulations, for example, they do not specify 'access to vehicle repair information'.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
One submitter requested that Indian emissions standard BS6 Phase 2 be added as an acceptable alternative standard in addition to Euro 6d, US Tier 3 and Japan 2018 emission standards. BS6 Phase 2 covers RDE standards and its limit (1.43 for NOx and 1.5 for PM) falls between Euro 6d and Japan 2018 emissions standards. (Euro 6d without OBD functions).	Further discussions with the submitter suggest that aligning with Australia will address the wider issue of ensuring a sufficient supply of Euro 6 compliant vehicles. However, the issue of whether New Zealand needs to recognise standards from other key vehicle manufacturing countries such as India and China will need to be considered at some point in the future.	No change.
One submitter advocated for the continued importation of new vehicles (existing models only) meeting Euro 6b/6c until 2028, stating that the differences in the exhaust gas emissions between these Euro 6b/6c/6d standards are minor and better than the Japan 2005 emission standard. It added that this would ensure continuity of supply for these vehicles with low emission level limits but currently excluded in the amendment Rule.	The decision to align with Australia will provide the time new vehicle distributors require to move to Euro 6d and ensure continuity of supply. Additionally, in contrast to Euro 6b and 6c, Euro 6d requires use RDE tests for new type approval. The testing of vehicles in real-world driving conditions has forced manufacturers to improve vehicle emissions control systems; resulting in Euro 6d being considered the more reliable standard for ensuring harmful emissions from light vehicles are reduced.	No change.
Two submitters recommend removing Japan 2005 emissions standard earlier and replacing it with Japan 2018 instead. Another submitter stated that it didn't understand why the proposal only allowed used cars manufactured after 2024 to meet the Japan 2018 emissions standard in 2026. It stated this was unnecessary as it believed all the Japanese marque cars had moved to the Japan 2018 emissions standard in 2021 and that the proposal should be corrected to reflect this.	A phased approach for Japanese used import petrol vehicles out to 2028 has been proposed. This is because Japan regulated an emissions standard for petrol vehicles similar in strength to Euro 6 in 2018. Given used petrol vehicle imports are on average 10 years old, it will take until 2028 before there is good volumes of used vehicles in Japan that meet Euro 6/VI standards. Petrol cars emit lower levels of noxious emissions than diesel ones, so a longer transition period for used petrol cars is not expected to undermine the benefits of this proposal.	No change.
One submitter stated that the Special Interest Vehicles (SIV) scheme needs to be expanded by 2028 as many sportier performance cars will not be able to be imported due to most only meeting 3XX emission standards.	Expanding the Special Interest Vehicles (SIV) scheme extends beyond the scope of this policy proposal to strengthen the exhaust emissions standards and is not proposed for adoption.	No change.
Two submitters supported the removal of the 5BA code under the definition of Japan 2018 Low Harm, stating that it imposes a	The inclusion of 5BA lowers the requirement for reduced harmful emissions from 75 percent (6XX codes) to 50 percent. However, a phased approach for Japanese used	No change.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
lesser requirement to reduce harmful emissions.	import petrol vehicles out to 2028 has been proposed to prevent disruption to the supply of used imports, and almost all used imports originate from Japan.	
One vehicle industry submitter supported the inclusion of CBA stating that it was "extremely unfair commercially" to exclude Cxx codes, including CBA.	Te Manatū Waka disagrees with the view that weaker Japanese standards should be recognised for used imports. Additionally, Waka Kotahi data indicates that it is a low volume of vehicles that are currently imported under this emission code and the impacts of its exclusion will be negligible.	No change.
One submitter requested that EPA10 is added alongside the existing USA Tier 3, and PPNLT alongside Japan 2016 to all tables for Heavy Commercial Vehicles for all implementation dates, on 1 November 2026.	The amendment Rule defines the USA Tier 3 standard parameters required. Therefore, including the individual criteria for specific tests in the emissions standard is not necessary.	No change.
Several submitters noted that switching to the Euro 6/VI emissions standards would also offer significant climate benefits, specifically due to the reduction in black carbon emissions, which is a major component of PM and an important short-lived climate pollutant. A submitter also noted that that other hazardous air pollutants such as carbon monoxide and oxides of nitrogen can also have an indirect impact on climate warming by boosting the generation of tropospheric ozone which is a greenhouse gas.	Euro emissions standards were put in place to improve air quality and health. However, Te Manatū Waka notes the additional climate benefits the Euro emissions standards have on the reduction of black carbon emissions, carbon monoxide and oxides of nitrogen. Additionally, Te Manatū Waka notes that adopting the Euro VI emissions standard for heavy vehicles is an action included in the Government's 2022 Emissions Reduction Plan (the ERP). *ERP action 10.3.1: Support the decarbonisation of freight, requires the Government to consider the implementation timing of Euro VI standard for heavy vehicles.*	No change.
One submitter noted that vehicles that comply with the most recent standards are also more likely to have a higher safety rating and collision avoidance features that are important to more vulnerable active transport users such as cyclists and pedestrians as the features reduce the likelihood of a crash resulting in death or serious injury. It added that the emission standards should take into account not only the reduction in pollution but also increased safety.	Te Manatū Waka agrees that increasing the uptake of Euro 6/VI vehicles could deliver safety benefits as newer vehicles tend to be safer. Including safety standards as part of emissions standards extends beyond the scope of this policy proposal to strengthen the exhaust emissions standard. and is not proposed for adoption. However, the Road to Zero Action Plan includes an action to investigate the uptake of new safety features in vehicles entering Aotearoa's vehicle fleet.	No change.

Issue raised in consultation	Te Manatū Waka View	Proposed changes to the Rule
Two submitters noted the additional costs of having to use a higher fuel speciation – 95 Octane – which would lead to an additional cost to Euro 6d car owners.	Te Manatū Waka notes the potential increased costs for some Euro 6d car owners. To date Japanese vehicle manufacturers, continue to test Japan 2018 Low Harm vehicles (the closest equivalent to Euro 6d) using 91 octane petrol.	

Key Themes

- There was overall support for moving to the Euro 6/VI emissions standards to reduce the serious health impacts from harmful vehicle emissions and improve air quality in New Zealand.
- The support was greatest among individuals, central and local government, community groups, NGOs, health and air quality professionals, and other advocacy bodies. Many of these submitters supported with the prosed timeframes or bringing them forward to introduce the Euro 6/VI emissions standards sooner.
- However, support from the vehicle industry, the Automobile Association and the road freight industry was conditional and based on the timeframes being pushed back and further additional changes being made to the draft Rule for the introduction of the Euro 6/VI emissions standards.

Requiring a stronger emissions standard for light vehicles

- There was support from the vehicle industry for the timeframes for used vehicles moving from Euro 4 to Euro 5. However, for the introduction of Euro 6 for light vehicles, the vehicle industry requested that New Zealand used the same timeframes as Australia. The vehicle industry stated that introducing Euro 6 ahead of Australia could place a significant cost burden on vehicle manufacturers.
- Moving ahead of Australia could result in manufacturers withdrawing vehicle models from the market completely which would reduce vehicle supply. Alternatively, the additional costs could be passed on to the New Zealand consumer which could result in people holding onto their older and more polluting vehicles for longer which would cause more harm.
- The vehicle industry also added that it needs a 24-month notice period prior to its adoption of new emissions standards due to production planning timeframes. Without a 24-month notice period, there was a risk that the supply volume and range of vehicles available for import to New Zealand could be reduced.

Requiring a stronger emissions standard for heavy vehicles

- The vehicle industry requested that New Zealand align with Australia on timeframes for the introduction of Euro VI-C for heavy vehicles and continue to remain aligned with the Australian Design Rule 80/04.
- Moving ahead of Australia and removing ADR 80/04 from the Rule could limited supply and could potentially drive-up costs significantly, resulting in operators retaining older vehicles for a longer period, which in turn would negate all the expected environmental and public health benefits of introducing the Euro VI emissions standard.
- The vehicle industry didn’t support the introduction of Euro VI-E ahead of Australia severely restrict the models available for sale in New Zealand. New Zealand is a small market, and it would be difficult for importers and distributors to meet unique manufacturing requirements.

- That the vehicle industry added it required a minimum 24-month notice period to comply from the adoption of any new Rule, which the current proposal did not provide. Without a 24-month notice period, there was a risk that the supply volume and range of vehicles available for import to New Zealand could be reduced.

Requiring motorcycles and mopeds to meet minimum exhaust emissions standard

- There was overall support for proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and mopeds. Submitters stated that this would reduce negative health impacts resulting from harmful emissions and improve air quality in New Zealand.
- The MIA and MTA supported the proposals for motorcycles but stated that mopeds should be exempted. Both reasoned that low-cost moped/scooter models would be impacted by the introduction of these emissions standards, and that it was unlikely to be re-engineered just for the New Zealand market. This would result in the choice and availability of affordable commuter vehicles being severely restricted.

Requiring a stronger emissions standard for vehicles modified for disabled people

- There was overall support for moving to the Euro 6/VI emissions standards to reduce the serious health impacts from harmful vehicle emissions and improve air quality in New Zealand.
- However, there was concern from submitters, who represented disabled people, that that under the current proposal, second-hand Toyota Hiace Welcabs which are used at present by wheelchair users, who cannot drive, and who are Lotto funded/self-funded applicants, would not meet the new required Japanese emissions standard (Japan 2018 Low Harm). This would mean these vehicles would no longer be allowed to be imported into the New Zealand by 2028.
- This would mean Lotto funded/self-funded applicants would likely have no affordable options, due to high costs and restricted Lotto funding, to purchase adapted vans by 2028.
- Submitters highlighted that this would further compound the transport inequity experienced by disabled people due to the limited accessible transport options available for disabled people e.g., accessible public transport and wheelchair taxis. Submitters added that disabled people needed access to a supply of modifiable vehicles to ensure they could actively participate and engage in society.

Proposal for accepted standards from other jurisdictions

- There was support from the vehicle industry to remove the Japan 2005 and Japan 2005 (Low Harm) emissions standard from the proposal for light vehicles and replace it with Japan 2018 and Japan 2018 (Low Harm) instead. The vehicle industry stated this

was unlikely to impact supply and would prevent vehicles that could be up to 18 years old and have considerably less stringent test regimes to determine accurate emission levels, being imported into New Zealand.

- The VIA stated that it did not understand the proposed groupings of international standards, that it did not match their own modelling, and that the stated equivalencies between European and Japanese standards needed to be corrected.
- The VIA presented an alternative proposal, where it compared and aligned emission standards from multiple jurisdictions, based instead on the estimated amount of potential health harm it caused in dollar-terms.
- A range of submitters from the heavy vehicle industry had differing positions on the proposed equivalencies of the Euro emissions standards with emissions standards from other jurisdictions, namely Japan, the USA and Australia.
- However, a common theme throughout the submissions highlighted concern that heavy vehicles sourced from European markets were being required to meet a higher standard compared to heavy vehicles complied to the US or Japanese standards, which would create an uneven playing field.
- This would result in vehicles, meeting the weaker Japanese or US emissions standards, being imported in favour of vehicles equipped with the Euro VI- E engine system, rendering all projected environmental and public health benefits that would come with the adoption of Euro VI-E redundant.
- This could also result in constraints on the supply of heavy vehicles and in a significant financial penalty for European truck, bus, and engine manufacturers, which would ultimately be passed on to heavy vehicle operators.

Introduction of Euro 6e and Euro 7/VII

- The support for adopting Euro 6e, UNECE R83/08 and Euro 7/VI was greatest among individuals, central and local government, community groups, NGOs, health and air quality professionals, and other advocacy bodies. Many of these submitters supported adopting Euro 6e, UNECE R83/08 and Euro 7/VI as soon as possible (where possible) or at the same time as Europe.
- The vehicle industry stated that New Zealand should align with Australia for adopting Euro 6e, UNECE R83/08 and Euro 7. The vehicle industry highlighted that it would need a minimum of two years for new models, that there would be additional costs associated with adopting Euro 6e, UNECE R83/08 and Euro 7/VII, and that further cost increases per vehicle could prove cost-prohibitive overall and result in the withdrawal of vehicle models from New Zealand.
- Some vehicle industry submitters disputed the overall benefits of adopting Euro 7 but also stated that there were many aspects of that standard that would not be realised in New Zealand. As a result, it rejected the claims made about the benefits of Euro 7 in the consultation documentation. The VIA cited the example that a benefit of Euro 7 is improved testing to assure emission accuracy in extreme temperatures of up to 45C, the inclusion of base speeds from 145 to 160 km/h, and a double durability requirement which the Government has already stated will not apply.

Question-by-question analysis of written submissions

Proposal one: Requiring a stronger emissions standard for light vehicles

1: Are you an importer of light vehicles?

Option	Total	Percent
Yes – new light vehicles	6	8%
Yes – newly imported used light vehicles	5	6%
No – I import other vehicles	3	4%
No – I am not a vehicle importer	63	82%

2: Do you consider the proposed timeframes to require stronger standards for harmful emissions from light vehicles should:

Option	Total	Percent
Be pushed back	8	10%
Be bought forward	28	36%
Proceed as proposed	24	31%
Not be implemented at all	1	1%
Not answered	16	21%

3: Please explain your answer for question for question two:

Answer: Be pushed back

Six vehicle industry submitters supported pushing back the timeframes to require stronger standards for harmful emissions from light vehicles. The most common themes in the submissions were:

- There was overall support for the adoption of the Euro 6 emissions standards in New Zealand, and reducing harmful emissions, but not under the proposed timeframes. Submitters from the vehicle industry requested that New Zealand aligns its timeframes, for the introduction of the Euro 6 emissions standards for light vehicles, with the Australian timeframes instead. However, the MIA, MTA and Soc NZ Ltd. were supportive of the timeframes for used vehicles transitioning from the Euro 4 and the Euro 5 emissions standard and SOC NZ Ltd. was supportive of the timeframes for used vehicles moving to the Euro 6 emissions standard.
- Mitsubishi advocated for the continued importation of new vehicles (existing models only) meeting Euro 6b/6c until 2028, stating that the differences in the exhaust gas

emissions between these Euro 6b/6c/6d standards are minor and better than the Japan 2005 emission standard. It added that this would ensure continuity of supply for these vehicles with low emission level limits but currently excluded in the amendment Rule.

- The MIA also stated that the vehicle industry needs a 24-month notice period prior to its adoption, due to production planning timeframes. It stated that without a 24-month notice period there was a risk that the supply volume and range of vehicles available for import to New Zealand would be impacted.
- The MIA added that if a product was only manufactured for New Zealand, the added cost would be a significant burden for the New Zealand consumer, as those units would need to pay for the additional engineering and Worldwide Harmonised Light-Duty Vehicles Test Procedure (WLTP) testing costs. Alternatively, if the cost was prohibitive for the manufacturer this could result in the model being withdrawn from the New Zealand market completely. It concluded that the ability to share these costs with Australia, spread over a much larger vehicle volume, was a far more beneficial outcome for the New Zealand consumer.

One **advocacy body** supported reducing harmful emissions but requested that New Zealand aligns its timeframes for the introduction of Euro 6 for light vehicles with Australia. The AA cited its concerns regarding supply disruption and constraints and increased costs for consumers.

One **private individual** supported reducing harmful emissions but requested that New Zealand aligns its timeframes for the introduction of Euro 6 for light vehicles with Australia. The submitter also advocated for the continued importation of vehicles (existing models only) meeting Euro 6b/6c until 2028.

Answer: Be brought forward

20 **private individuals** supported bringing forward the timeframes to require stronger standards for harmful emissions from light vehicles. The most common themes in the submissions were:

- Nine submitters reiterated their support to bring timeframes forward, common reasons included:
    i. the sooner the standards were implemented, the sooner air quality in New Zealand would improve;
    ii. that New Zealand should be leading the world and setting an example;
    iii. that New Zealand needed to incentivise only importing the most efficient and high quality vehicles;
    iv. that larger light vehicle imports (e.g., utes and SUV's) should be reduced due to their higher emissions;
    v. that the industry should already be ready and have been pro-active about this issue; and
    vi. that we should be trying to reduce vehicle ownership in general.
- Two submitters supported moving to Euro 7 now and then zero emissions vehicles only, by 2030 for new imports and 2035 for used. They added that Euro 7 emissions standard includes requirements for battery life which would be beneficial for the large number of first-generation Nissan LEAFs in the New Zealand fleet.

- Six submitters cited concerns regarding the health impacts and social costs of harmful emissions, including comments noting that the sooner the new emissions standards were introduced the quicker air quality would improve and the faster the death rate from human-made air pollution would reduce. One submitter also stated that the costs of purchasing a new car may become prohibitive and mean people hold onto their older and more polluting vehicle for longer which would prolong or cause more net harm. They suggested that to counteract this, the introduction of the new emissions standards should be accompanied by substantial investment in public transport and campaigns to encourage more walking and cycling, funded by taxes and road user charges (e.g., low emissions zones in our cities).
- Two submitters cited their general concerns regarding climate change including comments stating that New Zealand needed to show leadership on reducing greenhouse gas emissions and that we should move to Euro 6e now, then Euro 7 for new vehicles, and Euro 6d for used vehicles as soon as possible.

Seven submissions were received from **community groups, NGOs, health, and advocacy bodies** which supported bringing forward the timeframes to require stronger standards for harmful emissions from light vehicles. The most common themes in the submissions were:

- Seven submitters stated that New Zealand is behind Europe and other OECD economies in adopting Euro 6. Nelsust Inc. stated that New Zealand should be introducing Euro 6 for all new vehicles and used vehicles as soon as possible, with Euro 5 as an intermediate step for used vehicles. It added that New Zealand should match European standards from next year when Europe introduces Euro 7.
- Healthy Auckland cited concerns regarding the health impacts and social costs of harmful emissions and stated that the new emissions standards for light vehicles should be brought forward to 2024. It reasoned that light vehicle emissions make up most New Zealand's fleet emissions and contribute significantly to the harms of poor air quality. It also noted that Pacific communities have higher exposure to air pollution and are therefore more at risk of suffering the negative health effects caused by noxious vehicle emissions. The NAQWG also stated that bringing forward the timeframes would be the most effective way to reduce the impacts of poor air quality and improve population health.
- The ICCT submission, an international environmental transport policy research body, stated that timeframes for the adoption of the Euro 6 emissions standard should be as soon as possible to maximize the achievable benefits from Euro 6 standards in real-world emissions reduction. It suggested that New Zealand should directly progress from Euro 4/IV to Euro 6/VI standards for used light vehicles, and follow the same timeline as new vehicles, thereby skipping Euro 5/V and bringing the move to Euro 6/VI forward for used light vehicles.
- Consumer NZ stated that Euro 6/VI should be introduced for new light vehicles as soon as possible adding that as most of the global automotive market has already adopted Euro 6/VI, it did not think its introduction would significantly impede vehicle distributors in New Zealand. For used vehicles it stated that it supported the introduction of Euro 5/V by February 2024 and Euro 6/VI by February 2026. Consumer also added it supported Te Manatū Waka monitoring vehicle prices after the introduction of the stricter standards.

- Spokes stated that the timeframes to move to Euro 6d, US Tier 3, and Japan 2028 Low Harm should be sped up and completed by the end of 2025 for both new and used vehicles.
- Cycling Action Network stated that New Zealand has one of the highest levels of car dependency in the world and that restrictions on harmful air pollution were needed as soon as possible. It added that waiting over four years until the full restrictions were in place was irresponsible given the public health impacts.

One **vehicle industry** submitter supported bringing forward the timeframes to require stronger standards for light vehicle harmful emissions. Japan Direct's submission stated that the proposal put forward was a combination of "too easy in the beginning and too difficult by the final 2028 implementation". To improve the quality of used cars coming in from Japan, it suggested the implementation of an eleven-year rolling age requirement, as opposed to a static year, for compliance purposes. It asserted that implementing a rolling requirement would allow used car importers to prepare better for the final emission standards in 2028.

Answer: Proceed as proposed

Eight **private individual** submitters supported proceeding with timeframes as proposed to require stronger standards for harmful emissions from light vehicles. The most common themes in the submissions were:

- Five submitters reiterated their support to proceed with the timeframes, with one submitter noting that whilst supply issues should be considered in setting Euro 6 compliance dates for petrol vehicles, ensuring diesel vehicles compliance as soon as possible should be prioritised and that there were alternatives to ICE vehicles available. However, they did also note that Euro 6 could be delayed for new and used petrol vehicles as their impact on population health was low relatively modest.
- Two submitters cited concerns regarding the health impacts on children and social costs potentially being higher than those provided in the consultation document.
- One submitter stated that protecting the environment needed to come before commercial interests.

Nine **vehicle industry** submitters supported proceeding with timeframes as proposed to require stronger standards for harmful emissions from light vehicles. The most common themes in the submissions were:

- The VIA supports the proposed timeline for transitioning to Euro 5 and Euro 6 standards, providing the government accepts the VIA's alternative proposal for the equivalencies between European and Japanese emissions standards before proceeding with the policy. The VIA's submission was supported by other vehicle industry submitters: Autohub, Paul Kelly, Dolphin Shipping, Fast Track Cars, and Red Stag.
- However, the VIA stated that if the Government proceeded with the current proposed equivalencies, between European and Japanese emissions standards, then the timeframes should be pushed back. It argued that his was because the current proposed standards, and European and Japanese equivalencies, would "unfairly force used importers to meet standards well beyond what the new car industry has had to meet for the last decade".

- Daimler Truck Australia Pacific acknowledged that whilst it wasn't as familiar with light vehicles it liked the concept of providing lead in times but also noted concern for the used vehicle supply. It advocated for businesses being able to source a used vehicle model if a new vehicle model was unavailable.
- Ford supported proceeding with the timeframes, as proposed, and stated that some of its vehicle models, being supplied to New Zealand, already met the euro 6/VI emissions standard. Ford also added that it was working to ensure all the models, supplied to New Zealand, could meet Euro 6/VI by 2024, depending on the finalisation of the amendment Rule.

Three **local government agencies** reiterated their support for proceeding with timeframes as proposed, stating that it would support the work to reduce emissions and improve health and air quality for the regions of Wellington, Bay of Plenty and Otago.

One submission from a **community group, NGO, health, or advocacy body** reiterated its support for proceeding with timeframes as proposed. Living Streets stated that would assist in reducing the negative externality of private car use for people walking and enjoying public spaces.

Two **central government agencies** reiterated their support for proceeding with timeframes as proposed, with one stating that the timeframes were sufficient to allow for new models to arrive in New Zealand and offset potential supply issues as importers had notice several years in advance and can allow them to pre-plan factory allocations. Te Whatu Ora stated that the timeframes would ensure the reduction in social harms from harmful emissions, which are distributed inequitably across New Zealand, and that there would be a social cost saving of upward of $6.7b (accumulated to 2050).

Answer: Not be implemented at all

One **private individual** submitter **did not support** the timeframes to require stronger standards for harmful emissions from light vehicles. They cited their concerns regarding cost impacts for low- and middle-income people.

4: Do you agree with the grouping on international standards for each implementation date? Are the requirements and limitations of each international standard appropriately aligned?

Option	Total	Percent
Yes	26	34%
No – and why	17	22%
Not answered	34	44%

If you said no, please explain why:

Six **private individual** submitters did not agree with the groupings of international standards for each implementation date. Four of the submitters provided their reasoning with two stating they did not know enough about the standards to comment on the technical aspects but agreed generally with aligning with other countries who had already implemented newer and stricter emissions

standards. A third submitter stated that they thought New Zealand should just move to Euro 7 and the fourth disagreed with Japan 2018 being accepted as equivalent to Euro 6d for diesel vehicles stating that the Japan 2018 standard is weaker than Euro 6d.

10 **vehicle industry** submitters did not agree with the groupings of international standards for each implementation date.

- The VIA, and the five vehicle industry submitters who supported the VIA's submission, stated that it didn't understand the proposed groupings of international standards and that it did not match its own modelling. The VIA suggested an alternative model for comparing the different emissions standards from other jurisdictions, where it compared and aligned emission standards from multiple jurisdictions, based on the estimated amount of potential health harm caused in dollar-terms.
- The VIA requested that during the period of 2024–2027 the Japanese emissions standard equivalent to Euro 5 should be Japan 2005 and not Japan 2005 Low Harm. VIA stated that the Japan 2005 emissions standard should apply because it was the equivalent Japanese standard when the new vehicle industry shifted to Euro 5. For light diesel vehicles the VIA requested that Japan 2005 should be the equivalent Euro 5 standard, rather than the stronger Japan 2009. The VIA also requested that the definition of Japan 2018 Low Harm is widened to include additional specific emission codes.
- Japan Direct stated that it didn't understand why the proposal only allowed used cars manufactured after 2024 to meet the Japan 2018 emissions standard in 2026. It stated this was unnecessary as it believed all the Japanese marque cars had moved to the Japan 2018 emissions standard in 2021 and that the proposal should be corrected to reflect this.
- Mitsubishi recommended removing the Japan 2005 emissions standard and replacing it with the Japan 2018 emissions standard from 2025. It stated that vehicles which meet the Japan 2005 emissions standard could be up to 18 years old and have considerably less stringent test regimes to determine accurate emission levels. It reasoned that the Japan 2018 emissions standard would have been in place for at least 8 years by the commencement of the amendment Rule and it would expect this to be the minimum standard detailed for both new and used imports. It concluded that the Government cannot expect to improve air quality if the New Zealand market is continuing to import highly polluting used imports that are compliant with the older, and weaker, Japan 2005 emission standard.
- The MIA recommended that the Japan 2018 emissions standard be adopted in 2024 instead of the Japan 2005 Low Harm emissions standard. The MIA added that the Japan 2018 emissions standard has already been in place for six years and is unlikely to negatively impact the supply of used vehicles.
- Japan Direct added that the Special Interest Vehicles (SIV) scheme needs to be expanded by 2028 as many sportier performance cars will not be able to be imported due to most only meeting 3XX emission standards.

One **advocacy body** submitter did not agree with the groupings of international standards for each implementation date. Cycling Action Network stated that their recommendation was that all

vehicles should be brought up to the highest standards as soon as possible. It added that there should be no delay based on new or existing models that come into the market.

5: If you are a vehicle importer, what impact will this proposal have on your ability to supply light vehicles to Aotearoa?

Six **vehicle industry** submitters responded and the most common themes in the submissions were:

- New Zealand should align with Australian timeframes for the introduction of Euro 6 for light vehicles. Australia is considered a relatively small market globally, and New Zealand even smaller, which poses difficulty for importers and distributors in dictating unique manufacturing requirements for such a small market unless Australia requires those changes as well.
- The MIA stated that the vehicle industry needs a 24-month notice period prior to its adoption of new emissions standards due to production planning timeframes. It stated that without a 24-month notice period, there was a risk that the supply volume and range of vehicles available for import to New Zealand would be impacted and could cause model availability 'blackouts'. Toyota submitter noted that sourcing vehicles from Europe was not viable as the European market is predominantly left-hand drive and does not share many of the models that are needed in New Zealand.
- The MIA stated that products manufactured for New Zealand only would place a significant cost burden on the New Zealand consumer as those manufacturers will also need to pay for the additional engineering and Worldwide Harmonised Light-Duty Vehicles Test Procedure (WLTP) costs. Many submitters stated that the estimated costs could be significantly higher than those included in the consultation documentation and that the ability to share these costs with Australia, spread over a much larger vehicle volume, would be far more beneficial outcome for the New Zealand consumer.
- The MIA and MTA also noted the additional costs of having to use a higher fuel speciation – 95 Octane – as an additional cost to Euro 6d car owners.
- Japan Direct added that if the proposed timeframes were adopted, there was a significant risk of supply shock when distributors moved from being able to import fifteen-year-old vehicles in 2027 to a minimum of ten-year-old vehicles in 2028, citing the earliest implementation of Japan 2018 is in 2018 in some Mazdas. It stated that applying a rolling age ban, instead of the current proposals, would better prepare the market for the significant step change in 2028.

6: Europe has agreed to implement the stronger Euro 6e standard from September 2023. Euro 6e is anticipated to be harmonised into a global standard named UNECE Regulation 83 Series 08 around the middle of 2023, which countries can then adopt. Europe has drafted a proposal for Euro 7 to take effect from 2025 that would reduce diesel vehicle emissions significantly over Euro 6. The U.S. have proposed Euro 7-ambition requirements from 2027, and China from mid 2023.

When should Aotearoa require the Euro 6e and UNECE R83/08, and Euro 7 standards on light vehicles, which would further reduce harmful emissions, and why?

25 **private individual** submitters provided comment on New Zealand adopting Euro 6e, UNECE R83/08 and Euro 7. The most common themes in the submissions on timeframes were:

- Eight submitters stated they wanted New Zealand to adopt Euro 6e, UNECE R83/08 and Euro 7 as soon as possible with submitters commenting that it was necessary to reduce harmful emissions in New Zealand and one noting that New Zealand needed to catch-up with other global markets who had already implemented newer and stricter standards.
- Seven submitters stated they wanted New Zealand to adopt Euro 6e, UNECE R83/08 and Euro 7 at the same time as Europe, with two submitters referencing the US timeframes as well. Several submitters commented that this was necessary to reduce harmful emissions in New Zealand and that New Zealand shouldn't import vehicles of a lower standard when vehicles with higher standards were available in other markets such as Europe.
- Nine submitters stated they wanted New Zealand to adopt Euro 6e, UNECE R83/08 and Euro 7 as soon as was practically possible to do so. Many submitters commented this would help avoid supply impacts whilst still reducing harmful emissions in New Zealand.
- One submitter stated they didn't want New Zealand to adopt Euro 6e, UNECE R83/08 and Euro 7 so as not to increase costs for low- and middle-income people.

Ten **vehicle industry** submitters commented on New Zealand adopting Euro 6e, UNECE R83/08 and Euro 7. The most common themes in the submissions on timeframes were:

- New Zealand should align with Australia for adopting Euro 6e, UNECE R83/08 and Euro 7.
- The MIA submitters stated that there would be additional costs associated with adopting Euro 6e, UNECE R83/08 and Euro 7. It stated that further cost increases per vehicle could prove cost prohibitive overall and that as a result many models would cease to be imported to New Zealand.
- The VIA, and its five supporting submitters, stated that many of the benefits of Euro 7 would not be required in New Zealand e.g., the double durability requirement, performance in increased temperatures in recognition of climate change, and increased road speeds: 160 km per hour. Instead, the submitters suggested New Zealand should look at removing the "cross-subsidy" on diesel harm as soon as possible, by

harmonising diesel caps with petrol caps. The submitters added that New Zealand should start moving all imports to Euro 7 emission limits after this is completed.

Four submissions from **community groups, NGOs, health and advocacy bodies** all wanted New Zealand to adopt Euro 6e, UNECE R83/08 and Euro 7 at the same time as Europe. The submitters commented that it would reduce the harm of vehicle emissions in an efficient manner. The submitters added that not implementing the new emissions standards may result in an increase in higher emitting, used vehicles being imported into New Zealand as the market would accept them whereas other countries would not.

One **local government agency** stated it wanted New Zealand to bring forward the adoption of Euro 7 as soon as possible as this would maximise environmental and social benefits.

7: The proposed Amendment Rule includes the Japan emissions standard 5BA under the definition of Japan 2018 Low Harm. From your perspective, what would the impact on supply be if 5BA was included or excluded from the Amendment Rule?

Five **vehicle industry** submitters supported the inclusion of the Japan emissions standard 5BA. One submitter commentated that if 5BA was removed as an accepted emission code there would be a substantial reduction in the availability of efficient non-hybrid cars. The submitter stated that the code still meant that emissions were only 50% of the Japan 2018 emissions standard and that if 5BA was removed, then 5AA (hybrid) or 5LA (PHEV) should also be removed. The MIA added that if 5BA were excluded, this would significantly curtail the range and choice of vehicles available from Japanese marques and would in effect amount to a prohibition on conventional ICE vehicles from February 2025.

One **local government agency** supported the removal of the 5BA code from the Japan 2018 Low Harm emissions standard, stating that it imposes a lesser requirement to reduce harmful emissions. The submitter stated that given Japan is a leading exporter of vehicles to New Zealand, lower vehicle emissions would be maximised if all emission standards are aligned as closely as possible to the current Euro (or equivalent) standards.

One **advocacy group agency** supported the removal of 5BA code from the Japan 2018 Low Harm emissions standard, stating that it imposes a lesser requirement to reduce harmful emissions. The NAQWG added that it had concerns that the Japan 2005 and Japan 2018 emission standards were weaker than the Euro standards and that 5BA should be excluded.

8: The proposed Amendment Rule does not include the Japan emissions standard CBA under the definition of Japan 2005 Low Harm. From your perspective, what would the impact on supply be if CBA was included or excluded from the Amendment Rule?

Two **vehicle industry** submitters supported the exclusion of the Japan emissions standard CBA with one stating it was an inferior standard and another stating the exclusion would have no impact on used vehicles from Japan as only older European cars and pre VSC (Vehicle Stability Control) Japanese cars have this code.

One **vehicle industry** submitter supported the inclusion of CBA stating that it was “extremely unfair commercially” to exclude Cxx codes, including CBA.

One **local government agency** supported the removal of standard CBA from the Japanese emission standards, which impose a lesser requirement to reduce harmful emissions. The submitter stated that given Japan is a leading exporter of vehicles to New Zealand, lower vehicle emissions would be maximised if all emission standards are aligned as closely as possible to the current Euro (or equivalent) standards.

One **advocacy group agency** supported the removal of standard CBA from the Japanese emission standards, stating that it imposes a lesser requirement to reduce harmful emissions. The NAQWG added that it had concerns that the Japan 2005 and Japan 2018 emission standards were weaker than the Euro standards and that CBA should be excluded.

9: Te Manatū Waka also notes that there may be inconsistencies if 5BA is included and not CBA, however 5BA is subject to stronger testing standards so the impacts are not clear. Do you foresee any inconsistencies if 5BA is included and CBA is not?

One **vehicle industry** submitter commented that it did not think that it was inconsistent. It reasoned that there are no light vehicles being imported in New Zealand with the CBA emission standard. However, it noted that excluding 5BA would prevent a significant number of popular used cars in Japan from being able to be imported into New Zealand. However, the submitted added that there would be a point in the future where more and more cars are offered as solely hybrid/PHEV models in Japan and then 5BA or 6BA emissions standard will be phased out (possibly 2030).

One **vehicle industry** submitter supported the inclusion of Cxx stating that it should be included as meeting Euro 5.

Proposal two: Requiring a stronger emissions standard for heavy vehicles

10: Are you an importer of heavy vehicles?

Option	Total	Percent
Yes – new heavy vehicles	5	6%
Yes – newly imported used heavy vehicles	1	1%
No – I import other vehicles	9	12%
No – I am not a vehicle importer	62	81%

11: Do you consider the proposed timeframes to require stronger standards for harmful emissions from heavy vehicles should:

Option	Total	Percent
Be pushed back	8	10%
Be bought forward	25	32%
Proceed as proposed	17	22%
Not be implemented at all	0	0%
Not Answered	27	35%

12: Please explain your answer for question for question two.

Answer: Be pushed back

Seven **vehicle industry** submitters supported pushing back the timeframes to require stronger standards for harmful emissions for heavy vehicles. The most common themes in the submissions were:

- That New Zealand should align with Australia on timeframes for the introduction of Euro VI-C for heavy vehicles and that the Australian Design Rule 80/04 emissions standard should not be removed on 1 November 2026. Submitters stated that moving ahead of Australia and removing ADR 80/04 from the Rule would cause detrimental impacts to the supply volume and range of vehicles available for import into New Zealand.
- That the vehicle industry required a minimum 24-month notice period to comply from the adoption of any new Rule, which the current proposal did not allow for, otherwise there could be detrimental impacts on the supply volume and range of vehicles available for import to New Zealand. s 9(2)(ba)(i) MIA, and MTA (who supported the MIA's submission on heavy vehicles) recommend that the current proposed date of 1 Nov 2024 for Euro VI-C 'newly introduced models' should be moved out accordingly and that 'existing models' should follow by a further 12 months afterwards. s 9(2)(ba)(i) s 9(2)(ba)(i)
- That Euro VI-E should not be introduced in New Zealand before Australia. The MIA and the MTA stated that the introduction of Euro VI-E would very likely severely restrict the models available for sale in New Zealand because some of the biggest suppliers of trucks into New Zealand can only supply models that meet the Australian (ADR) standards. Australia is considered a relatively small market globally, and New Zealand is even smaller, thus it is difficult for importers and distributors to meet unique manufacturing requirements for such a small market unless Australia requires those changes as well.

- That there were no additional emissions benefit in adopting Euro VI-E over VI-C as many of the Euro VII emissions standard requirements relate to other factors which seek to ensure emissions limits are met throughout the vehicle's lifecycle. The NOx and particulate matter limits, laboratory test cycle and on-board diagnostics system requirements for the engine/exhaust aftertreatment system are the same at Euro VI-C. The main change of Euro VI-E is introducing the requirement for in-service conformity (ISC) testing, for which there are no facilities in New Zealand capable of performing this, and so the Rule would need to exempt heavy vehicles from this additional requirement.
- That there are additional associated manufacturing costs for Euro VI heavy vehicles. The MIA and MTA stated the costs associated with meeting Euro VI standard range from approximately: $4,000 – $5,000 for a light truck and $8,000 – $20,000 for a heavy truck, with Ia Ara Aotearoa noting that road freight companies are already under considerable cost pressure. Cummins Inc. also added that the Australian Government has found that the costs of adopting the stage D or E requirements would outweigh the public health benefits to the community compared to stage C.

Answer: Be bought forward

14 **private individual** submitters supported bringing forward the timeframes to require stronger standards for harmful emissions for heavy vehicles. The most common themes in the submissions were:

- Seven submitters reiterated their support to bring timeframes forward, common reasons included:
    i. that this would accelerate the reduction of harmful emissions and improve health outcomes;
    ii. that this would reduce environmental harms;
    iii. that New Zealand should be leading the world and setting an example; and
    iv. that the industry should have been pro-active and already be prepared.
- Three submitters cited concerns about climate change saying that New Zealand should be acting on this issue and that there wasn't a good reason to still be importing ICE vehicles that run on fossil fuels anymore.
- Four submitters cited concerns that heavy vehicles caused more air pollution than light vehicles and that stricter emissions standards for heavy vehicles would have a bigger impact.

Six submissions were received from **community groups, NGOs, health, and advocacy groups** which supported bringing forward the timeframes to require stronger standards for heavy vehicle harmful emissions. It was reasoned that it would reduce the impacts health of poor air quality quicker. Consumer commented that it would support bringing forward the timeframes for new heavy vehicles stating that as most of the global automotive market had already adopted Euro VI and it didn't think its introduction would significantly impede vehicle distributors in New Zealand. Consumer also stated that it supported the introduction of Euro 5/V by 1 February 2024 and Euro 6/VIC by 1 November 2025 for used heavy vehicles. The ICCT also suggested that used heavy vehicles should move straight to Euro VI and follow the same timeframes as new heavy vehicles instead of transitioning through Euro V first. Nelsust Inc. added that New Zealand should be

moving to low/zero emission transport alternatives for freight such as rail, coastal shipping and battery swapping electric heavy vehicles.

Answer: Proceed as proposed

Four **private individual** submitters reiterated their support for proceeding with timeframes as proposed to require stronger standards for harmful emissions from heavy vehicles stating that the sooner the standards were implemented, the faster air quality would improve in New Zealand.

Three **local government agencies** reiterated their support for proceeding with timeframes as proposed to require stronger standards for harmful emissions for heavy vehicles stating that it would support the work to reduce emissions and improve health and air quality for the regions of Greater Wellington, Bay of Plenty, and Otago.

One submission was received from an **advocacy group** which reiterated its support for proceeding with timeframes as proposed to require stronger standards for harmful emissions for heavy vehicles. Living Streets Aotearoa stated that it would reduce emissions and improve health and air quality.

Two **vehicle industry** submitters reiterated their support for proceeding with timeframes, as proposed, stating that the timeframes were reasonable for the industry. Although the Symons Group noted that a good supply of used vehicles must remain available in case the new standards caused supply issues to arise for new vehicles. Fonterra stated that it saw moving to Euro VI as part of its commitment to community and environmental sustainability. It added that thirty-five of their current fleet of 156 high productivity milk tankers are Euro VI compliant vehicles and from the next financial year, all new tankers coming into its fleet will be Euro VI compliant.

One **central government agency** reiterated their support for proceeding with timeframes as proposed to require stronger standards for harmful emissions for heavy vehicles stating that it would reduce emissions and improve health and air quality.

Answer: Not be implemented at all

There were no responses submitted for this part of the question.

13: Do you agree with the grouping on international standards for each implementation date? Are the requirements and limitations of each international standard appropriately aligned?

Option	Total	Percent
Yes	22	29%
No – and why	7	9%
Not Answered	44	57%

If you said no, please explain why:

Six **vehicle industry** submitters did not agree with the groupings of international standards for each implementation date. The most common themes in the submissions were:

- That Euro VI-E should not be included. The MIA and the MTA stated that the introduction of Euro VI-E would very likely severely restrict the models available for sale in New Zealand. This is because some of the biggest suppliers of trucks into New Zealand can only supply models that meet the Australian (ADR) standards. This is because Australia is considered a relatively small market globally, and New Zealand is even smaller, thus it is difficult for importers and distributors to dictate unique manufacturing requirements for such a small market unless Australia requires those changes as well.
- That the Australian Design Rule 80/04 emissions standard should not be removed on 1 November 2026. Submitters stated that moving ahead of Australia and removing ADR 80/04 from the Rule would cause detrimental impacts to the supply volume and range of vehicles available for import into New Zealand.
- s 9(2)(ba)(i)
- The MIA stated that the three emissions standards proposed are not wholly equivalent and that 'US Tier 3' (same as US 2007 in the current Rule), is approximate to Euro V, whilst the 'Japan 2016' emissions standard is approximate to Euro VI-A and has inferior On-Board Diagnostics (OBD) requirements. It also added that both standards are lower than proposed in ADR 80/04 which specifies US 2013 or later (as this USA regulation has been updated with a more stringent OBD requirement - like Euro VI-C) and the also the 'Japan 2017' emissions standard. It stated that this resulted in heavy vehicles sourced from European markets being required to meet a higher standard compared to heavy vehicles complied to the US or Japanese standards, resulting in a significant financial penalty for European truck, bus, and engine manufacturers, which will ultimately be passed on to heavy vehicle operators.
- Cummins Inc. noted that Euro VI- E has a more stringent real-world emissions requirement than the other accepted emissions standards, such as the Japan 2016 and US Tier 3 emissions standards, which creates an uneven playing field. This would result in vehicles with engine systems certified to the Japan 2016 and US Tier 3 emissions standards being imported in favour of vehicles equipped with the Euro VI- E engine system, rendering all projected environmental and public health benefits that would come with the adoption of Euro VI-E redundant. This could also result in constraints on the supply of heavy vehicles.
- Cummins Inc. also added that the real-world emissions for the Japan 2016 emission standard may be weaker than Euro VI- C because the standard does not have a Particulate Numbers (PN) limits and it also does not require any in-service or portable emissions measurement system (PEMS) testing for certification. However, the new Japan 2023 emissions standard, which will only be enforced from Oct 2023, will include PN limits that are similar to Euro VI- C, but PEMS testing will still not be required. It

concluded that Euro VI-C was more like the Japan 2023 emissions standard than the Japan 2016 emissions standard. Thus, grouping Japan 2016 with Euro VI- E would create an uneven standard favouring the Japanese standards.

- Cummins Inc. also stated that if the US Tier 3 standard is treated as an acceptable alternative to Euro VI- E, then Euro VI-C should also be accepted as well. It stated this was because the main difference between Euro VI-C and Euro VI-E is in the stringency in the PEMS testing, while the gaseous pollutants limits stayed the same.

14: If you are a vehicle importer, what impact will this proposal have on your ability to supply heavy vehicles to Aotearoa?

Seven **vehicle industry** submitters responded, and the most common themes were:

- That New Zealand should align with Australia on timeframes for the introduction of Euro VI-c for heavy vehicles and that the Australian Design Rule 80/04 emissions standard should not be removed on 1 November 2026. Submitters stated that moving ahead of Australia and removing ADR 80/04 from the amendment Rule would cause detrimental impacts on the supply volume and range of vehicles available for import to New Zealand. Cummins Inc. stated that removal of ADR 80/04 would create an administration burden and increases in cost of vehicles. s 9(2)(ba)(i) s 9(2)(ba)(i)
- That the vehicle industry required a minimum 24-month notice period to comply with the requirements of any new Rule, which the current proposal did not allow for, otherwise there could be detrimental impacts on the supply volume and range of vehicles available for import to New Zealand. s 9(2)(ba)(i) MIA, and MTA (who supported the MTA's submission on heavy vehicles) recommend that the current proposed date of 1 Nov 2024 for Euro VI-C 'newly introduced models' be moved out accordingly and for 'existing models' to follow by a further 12 months thereafter. s 9(2)(ba)(i) s 9(2)(ba)(i)
- That Euro VI-e should not be introduced before Australia. The MIA and the MTA stated that the introduction of Euro VI-e would very likely severely restrict the models available for sale in New Zealand. This is because some of the biggest suppliers of trucks into New Zealand can only supply models that meet the Australian (ADR) standards. This is because Australia is considered a relatively small market globally, and New Zealand is even smaller, it is difficult for importers and distributors to dictate unique manufacturing requirements for such a small market unless Australia's require those changes as well.
- Road freight companies will retain older vehicles if there is a reduction in vehicle supply and appropriate replacements cannot be sourced. Ia Ara Aotearoa stated this would be the worse outcome for the reduction of harmful emissions. It added that their members were already reporting delays of up to two years when purchasing heavy vehicles from

original equipment manufacturers, which makes them particularly sensitive to further delays.

- Ia Ara Aotearoa added that it was concerned that there was a lack of complementary policy incentives being considered in parallel with this proposal. It highlighted that policies for accelerating the uptake of low and zero-emission vehicles are still being worked through by other policy teams in Government and that a siloed approach made it difficult for them to assess the full the impact of this proposal on their members.

15: Europe has drafted a proposal for Euro VII to take effect from mid 2027 that would reduce diesel vehicle emissions significantly from Euro VI. The U.S. have enacted Euro VII-ambition requirements from 2027, and China from mid 2023. When should Aotearoa in principle require the Euro VII standard for heavy vehicles and why?

15 **private individual** submitters commented on New Zealand adopting Euro VII for heavy vehicles. The most common themes in the submissions were:

- Three submitters stated they wanted New Zealand to adopt Euro VII as soon as possible commenting that it was necessary to reduce harmful emissions in New Zealand with one submitter stating we should implement Euro VII by 2026 and another stating we should skip Euro VI-E and go straight to Euro VII.
- Nine submitters stated they wanted New Zealand to adopt Euro VII at the same time as Europe. A few submitters commented that it was necessary to reduce harmful emissions in New Zealand and that New Zealand shouldn't import vehicles of a lower standard when they were available in other markets such as Europe.
- One submitter stated they wanted New Zealand to adopt Euro VII to reduce climate change.

Eight **vehicle industry** submitters commented on New Zealand adopting Euro VII for heavy vehicles. The most common themes in the submissions were:

- That Euro VII should not be adopted by New Zealand until Australia, and other jurisdictions, have adopted Euro VII emissions standards. The MIA and MTA stated that it was their strong preference to follow Australia timeframes for the adoption of (subsequent) emissions standards to retain access to supply and choice of heavy commercial vehicles. Moving ahead of Australia could limit supply of vehicles and could potentially drive-up costs significantly, resulting in operators retaining older vehicles for a longer period, which in turn would negate all the expected environmental and public health benefits of adopting Euro 7. s 9(2)(ba)(i)
s 9(2)(ba)(i)
- Japan has not announced its plan for the next generation emission standards. Cummins Inc. raised concerns that the Euro VII requirement would eliminate Japan certified heavy vehicles from the supply base. Cummins Inc. added that if Aotearoa would like to continue relying on Japan as a supply base, it would be beneficial to wait for Japan to announce their next generation emissions regulations before setting a timeframe to adopt Euro VII regulations.

- That the emission standards to be enacted by China from mid 2023 are not at the same stringency as Euro VII or the 2027 standards in the US. Cummins Inc stated that the standards could instead be considered equivalent to Euro VI, with some unique requirements in PEMS testing, diagnostics, and remote sensing. Like Japan, China's next generation emission standards have not been announced yet.
- In addition to the above, Ia Ara Aotearoa stated that several pre-conditions would need to be met before New Zealand could adopt Euro VII including:
    i. purchase incentives for Euro VII heavy vehicles;
    ii. regulatory flexibility to enable the import of Euro VII vehicles without significant modification, including vehicle dimensions and mass;
    iii. substantial investment in New Zealand's heavy vehicle electric charging network; and
    iv. substantial investment in roads and bridges to ensure our roading network is prepared for bigger, heavier low and zero emission vehicles.
- It concluded that until a timeline for these pre-requisites is set out, considering a Euro VII implementation date is unhelpful.
- The MIA noted their understanding was that Euro VII will lead to an increase in CO_2 emissions due to increased fuel consumption resulting from the need to warm up the catalyst from cold starts which could be counterproductive to goals to reduce CO_2 emissions.[4]
- Scania cited concerns that trying to implement the new emissions standards and EVs or other future zero emission technologies simultaneously would be a strain on resources and slow overall development in these areas which is counterproductive to reaching climate goals. Scania stated it would result in a high cost to the end user and consumer with possible very little gain. It advocated for focusing resources on decarbonisation instead.

Four **community groups, NGOs, health, and advocacy bodies** commented on New Zealand adopting Euro VII for heavy vehicles. The NAQWG stated that the implementation of Euro VII emission standards for heavy vehicles should occur no later than 1 January 2030. Consumer and Healthy Auckland also supported introducing Euro VII for heavy vehicles with Consumer stating that once Te Manatū Waka had finalised timeframes for Euro VI it should start planning for the adoption of Euro VII.

Two **local government agencies** commented on New Zealand adopting Euro VII for heavy vehicles. Greater Wellington Regional Council encouraged the timeframes for adopting Euro VII emissions standards be bought forward whereas Bay of Plenty Regional Council stated that Euro VII (or equivalent) to be included in the current proposals to reduce harmful emissions and improve air quality in New Zealand.

[4] https://www.frontier-economics.com/uk/en/news-and-articles/news/news-article-i10318-regulatorycosts-of-euro-7-matter/

Proposal three: Requiring motorcycles and mopeds to meet minimum exhaust emissions standard

16: Are you an importer of motorcycles and/or mopeds?

Option	Total	Percent
Yes – new motorcycles and/or mopeds	1	1%
Yes – newly imported used motorcycles and/or mopeds	0	0%
No – I import other vehicles	13	17%
No – I am not a vehicle importer	63	82%

17: Do you consider the proposed timeframes to require stronger standards for harmful emissions from motorcycles and/or mopeds should:

Option	Total	Percent
Be pushed back	1	1%
Be bought forward	22	29%
Proceed as proposed	21	27%
Not be implemented at all	1	1%
Not Answered	32	42%

18: Please explain your answer for question for question two.

Answer: Be pushed back

There were no responses submitted for this part of the question.

Answer: Be bought forward

17 **private individuals** supported bringing forward the timeframes to require stronger standards for harmful emissions for motorcycles and mopeds. The most common themes in the submissions were:

- 10 submitters reiterated their support to bring timeframes forward, common reasons included:
    i. that the sooner the standards were implemented the quicker air quality would improve in New Zealand;
    ii. that electric alternatives were available;
    iii. that left- and right-hand drive concerns did not apply so there was very little downside to having a fast implementation date; and
    iv. that the industry should already be ready and have been pro-active about this.

- Four submitters cited concerns regarding the health impacts and social costs of harmful emissions, including comments noting that the sooner the stricter standards were introduced, the quicker air quality would improve and avoidable deaths from human-made air pollution would reduce. A submitter also stated that the potentially higher costs of purchasing a car may mean people hold onto their older and more polluting vehicle for longer which would cause more harm. They suggested that to counteract this, the introduction of the stricter standards should be accompanied by substantial investment in public transport and campaigns to encourage more walking and cycling, funded by taxes and road user charges (e.g., low emissions zones in our cities). One submitter noted that motorcycles produce significantly more particulate matter than ICE light vehicles. However, they added that harmful emissions from motorcycles was reduced significantly when these vehicles met the Euro 4 emissions standard.
- One submitter cited their concern for climate change stating that New Zealand needed to show leadership on reducing greenhouse gas emissions and that we should move to Euro 6e now and then Euro 7 for new vehicles, and Euro 6d for used vehicles as soon as possible.
- Two submitters commented that two-stroke moped emissions should be regulated tightly as they are worse than diesel vehicles and mostly only used in urban areas where particulate pollution is the worst.

Answer: Proceed as proposed

Six submissions were received from **community groups, NGOs, health and advocacy bodies** which supported proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and mopeds stating that it would reduce emissions and improve health and air quality.

Five **private individuals** supported proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and mopeds. One submitter noted that the timeframes would provide the industry enough time to adapt with another submitter noting that two stroke engines contributed significantly to air pollution.

Three **vehicle industry submitters** supported proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and mopeds. The MIA and MTA supported the proposals for motorcycles, but that mopeds should be exempted. Both reasoned that low-cost moped/scooter models would be impacted by the introduction of these emissions standards, and that it was unlikely to be re-engineered just for the New Zealand market. This would result in the choice and availability of affordable commuter vehicles being severely restricted. Harley-Davidson stated that it would be able to meet the proposed timeframes.

One **central government agency** supported proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and moped, stating that it would reduce emissions and improve health and air quality.

One **local government agency** supported proceeding with the proposed timeframes to require stronger standards for harmful emissions for motorcycles and mopeds, stating that it would reduce emissions and improve health and air quality.

Answer: Not be implemented at all

One **private individual** submitter **did not support** the timeframes to require stronger standards for harmful emissions from light vehicles. They cited their concerns regarding cost impacts for low- and middle-income people.

19: Do you agree with the grouping on international standards for each implementation date? Are the requirements and limitations of each international standard appropriately aligned?

Option	Total	Percent
Yes	20	26%
No – and why	5	6%
Not Answered	52	68%

If you said no, please explain why:

There were no responses submitted for this part of the question.

20: If you are a vehicle importer, what impact will this proposal have on your ability to supply motorcycles and/or mopeds to Aotearoa?

The VIA's submission stated that it had no specific expertise or representative authority regarding motorcycles and mopeds. However, it commented that the focus should be on reducing absolute harm, not a relative harm per market segment. It stated that as far as harm from emissions go, the public would be best served by every road user transitioning to even the dirtiest motorcycle. Adding that placing restrictions on motorcycles would limit options for that transition, which in turn would make it more expensive.

Proposal four: Provisions for disability vehicles

21: Are you an importer of disability vehicles?

Option	Total	Percentage
Yes – new disability vehicles	0	0%
Yes – newly imported used disability vehicles	1	1%
No – I import other vehicles	14	18%
No – I am not a vehicle importer (but I do purchase or use disability vehicles)	2	3%
No – I am not a vehicle importer and I do not purchase or use disability vehicles.	60	78%

22: Do you consider the proposed timeframes to require stronger standards for harmful emissions from disability vehicles should:

Option	Total	Percentage
Be pushed back	2	3%
Be bought forward	9	12%
Proceed as proposed	23	30%
Not be implemented at all	5	6%
Not Answered	38	49%

23: Please explain your answer:

Answer: Be pushed back

Two **private individuals** supported pushing back the timeframes to require stronger standards for harmful emissions for disability vehicles stating that the number of vehicles for disabled people in the fleet overall was so small that the impact on air pollution from these vehicles would be insignificant compared to other groups of vehicles in the fleet. They also highlighted that disabled people faced more financial disadvantage and may be unable to afford a new and less polluting vehicle. They also added that if the new emissions standards caused supply constraints that this would impact on disabled people having access to the vehicles they required to equitably engage in society.

Answer: Be bought forward

Two **private individuals** supported bringing forward the timeframes to require stronger standards for harmful emissions for disability vehicles. They added that support should be provided to enable disabled people to have access to cleaner and less polluting vehicles.

One **advocacy group** supported bringing forward the timeframes to require stronger standards for harmful emissions for disability vehicles. Cycling Action Network stated that four and a half years was too long to wait for new emissions standards requirements and the intervening harm caused. It added that any measures taken to mitigate supply constraints because of new requirements should be prioritised towards disabled people.

Answer: Proceed as proposed

Six **private individuals** supported proceeding as proposed with the timeframes to require stronger standards for harmful emissions for disability vehicles. The submitters noted that the number of vehicles for disabled people in the fleet overall was small and that the impact on air pollution from these vehicles would be insignificant compared to other groups of vehicles in the fleet. They also highlighted that disabled people faced more financial disadvantage than other segments of society and may be unable to afford a new vehicle so support should be provided to facilitate disabled people having access to cleaner and less polluting alternative forms of transport. One submitter stated that that for some disabled people, these vehicles represented the only way they were able to travel in an independent, accessible, and convenient way. Therefore, it was imperative that the supply of suitable vehicles, that could be modified to meet the needs of people with mobility

impairments, remained plentiful. They also noted that not all EVs would be suitable for disabled people in wheelchairs as these vehicles were often smaller in size due to the positioning of batteries on floors of vehicles. However, the submitter stated that they would support the introduction of Euro 6 Euro 7 emissions standards, within the next five years, providing the supply of suitable vehicles, that could be modified to meet the needs of people with mobility impairments, remained plentiful. They concluded that stronger air pollution standards were needed but that disabled people shouldn't be left behind in the process.

Four **community groups, NGOs, health and advocacy bodies** supported proceeding as proposed with the timeframes to require stronger standards for harmful emissions for disability vehicles. Nelsust Inc. stated that the number of vehicles for disabled people in the fleet overall was small so the impact of air pollution from these vehicles would be less than other vehicles. Spokes added that disabled people are limited in their ability to reduce their emissions by modal change and advocated for those affected by these changes having the strongest say in this provision.

One **vehicle industry** submitter supported proceeding as proposed with the timeframes to require stronger standards for harmful emissions for disability vehicles.

Answer: Not be implemented at all

Two **private individual** submitters did not support the timeframes to require stronger standards for harmful emissions from disability vehicles. One submitter cited their concerns regarding cost impacts for low- and middle-income disabled people and their support networks. The other submitter cited their experience as an Occupational Therapist who had worked on driver assessments and vehicle modification, stating that over the past few years, the vehicles available in the market for disabled people had decreased. This was because the standard cost of these vehicles and the modification costs had increased, and timeframes for both vehicle imports and parts required had increased, whereas the funding available had not increased in line with these additional costs. The submitter concluded that restrictions on what vehicles can be imported would place further demands on an already stretched disability vehicle market, both in terms of availability and funding, and further increases to the timeframes involved.

The submitter also noted that if vehicles did not meet the new emissions standard, then an exemption application would be required for each individual disability modified vehicle, which would add further time delay in addition to the time that it already takes to receive and modify the vehicle to meet the client's needs.

The submitter acknowledged that whilst disabled people were more likely to be impacted by poor air quality, vehicles modified for disabled people were such a small percentage of the overall vehicle fleet in New Zealand, that the changes the new emissions standards would make would be minimal. They stated it seemed unequitable that disabled people were being asked to take on more expense and responsibility 'for the greater good'.

One **advocacy body** did not support the timeframes to require stronger standards for harmful emissions from disability vehicles. The Disabled Persons Assembly (DPA) stated that the proposals for vehicles modified for disabled people would further increase the disparity in the level of support provided to disabled people who rely on ACC funding for disability vehicles, and those who are self-funded or are awarded Lotto funding. Wheelchair users who cannot drive can apply to the Lotteries board for funding, for a wheelchair van of their own, but only a third of the applications are successful.

Lotto funded van applicants are given $41 000 however, this is often not enough to cover the costs for a modified van outright. Therefore, applicants often must resort to fundraising, asking service clubs for help, or getting a bank loan to raise the amount needed for a modified van. As a result of the lack of funding, Lotto funded vans are often second-hand, 10-12 year old Toyota Hiace Welcabs and have odometers in excess of 150,000 km.

The DPA noted that under the current proposal that no second-hand vans of the type used at present Lotto funded/self-funded applicants will be allowed into the country by 2028. The DPA understood that from the current proposal only new low emission vans, or vans less than 4 years old with low emissions profiles would be allowed to be imported in New Zealand. This would mean Lotto funded/self-funded applicants would likely have no affordable options to purchase adapted vans by 2028, adding that transport options for disabled people, not funded through ACC, are severely limited e.g., accessible public transport and wheelchair taxis.

DPA acknowledged that while Te Manatū Waka have proposed the longest of all relevant compliance dates for new and used vehicles adapted for disabled people, but it did not agree that this is sufficient to prevent further transport disadvantage to disabled people. DPA suggested an alternative approach whereby rebates and grants were provided to disabled people who buy or change to less polluting vehicles. It stated that this approach that would reduce the transport disadvantage faced by some disabled people, rather than widen it.

DPA also urged Te Manatū Waka to set up a group including disabled people, DPA, Te Manatū Waka, Waka Kotahi, and industry experts, to work out the best incentives and levers to incentivise disabled people to purchase less polluting and harmful vehicles; and to import and adapt less polluting and harmful vehicles at the most affordable price and with minimum waiting times.

One **vehicle industry** submitter did not support the timeframes to require stronger standards for harmful emissions from disability vehicles. Freedom Mobility/Vehicle Adaptions reiterated that Lotto funded wheelchair vans were based on the 10–12 year old used import Toyota Hiace Welcabs sourced from Japan. It noted that that in 2028 Toyota Hiace Welcabs vehicles would no longer be able to be imported into New Zealand as it would not meet the required Japanese emissions standard (Japan 2018 Low Harm), and this vehicle model has only ever been manufactured to meet the broader Japan 2018 regulation. Freedom Mobility/Vehicle Adaptions added that their Japanese contacts believe there are no planned future regulations for domestic Japanese Hiace Welcab vans to meet stricter emissions standards. This means that the one affordable van option for disabled people in New Zealand will not be allowed into the country, and there will be no suitable unmodified vans available for Lotto funded users from 2028 onwards.cent

Freedom Mobility/Vehicle Adaptions concluded that if nothing else in the disability transport landscape changes, by 2028 and beyond, there would be many wheelchair users stuck at home without any transport options, albeit “perhaps breathing slightly cleaner air”. It requested that Te Manatū Waka review the two-tier disability vehicle funding system and find the finance to support all wheelchair passengers to have access to modifiable Euro 6 compliant vans from 2028.

One **central government agency** submitter did not support the timeframes to require stronger standards for harmful emissions from disability vehicles. It cited their concerns regarding equity and ensuring disabled people the access to the vehicles required for them to effectively engage in society.

24: Do you agree with the grouping on international standards for each implementation date? Are the requirements and limitations of each international standard appropriately aligned?

Option	Total	Percent
Yes	18	23%
No – and why	4	5%
Not Answered	55	71%

If you said no, please explain why:

There were no responses submitted for this part of the question.

25: If you are a vehicle importer, what impact will this proposal have on your ability to supply disability vehicles to Aotearoa?

One **vehicle industry** submission reiterated the issues covered previously relating to Toyota Hiace Welcabs availability for disabled peoples. Freedom Mobility/Vehicle Adaptions added that their Japanese contacts believe that there are no plans for Japanese Hiace Welcab vans to meet low emissions standards into the future. This would mean that the one affordable van option for disabled people will not be allowed into the country, and there will be no base vans at all available for lotteries funded users from 2028 onwards.

Accepted standards from other jurisdictions

26: Do you agree with the comparison of other standards with Euro standards presented here?

Option	Total	Percent
Yes	25	32%
No	4	5%
Not Answered	48	62%

27: If you answered "no", what would you change?

An alternative approach to comparing standards was proposed

The VIA did not agree with the proposed comparisons of European standards with standards from other jurisdictions as set out in the consultation documentation. The VIA presented an alternative proposal, where it compared and aligned emission standards from multiple jurisdictions, based on the estimated amount of potential health harm it caused in dollar-terms, instead. It reasoned, for example, that restricting diesel vehicles, which are known to be a source of significant exhaust emission harm, would be more beneficial than imposing restrictions across both diesel and (petrol) vehicles simultaneously. It concluded that its approach ensures a greater reduction in overall harm

and a smoother transition which is similar to the strategies that will be used for the Euro 7 standard (fuel agnosticism). It also added that whilst their alternative proposal focused on light vehicles, it firmly believed that their proposed methodology and arguments should be applied across all vehicle types.

The VIA stated that their methodology was developed by applying harm ratings from the HAPINZ 3.0 report to emissions caps for specific gases specified by each standard. This provided it with a single harm rating for each standard. It also applied an emission test normalisation based on the normalisation equations specified by the ICCT for CO_2. These equations are currently used within the Clean Car Programme to normalise varied testing procedures to the WLTP. This allowed its model to account for the improvements in emissions tests as it improves over time, even if the emission caps do not change across different standards.

The VIA did acknowledge the limitations of this method as the methodology it was based upon was focused specified on CO_2. It argued that since the emissions are all a by-product of burning fuel, it is logical that a specific increase in CO_2 would see a similar increase in other gases produced by the burning of fuel (except for NOx). The VIA stated it was committed to working with the government to improve this methodology.

Table 1: VIA's comparison of EU and Japanese emissions standards:

Petrol Light Passenger and Commercial Standards		
EU Standard	**Example Japanese Equivalent (there may be other levels of achievement within Japanese standards that will also achieve the desired harm reduction)[5]**	**Example Japanese Emission Codes**
Euro 5, (approx. harm cap per 1000km) Passenger: $34 Commercial: $43	Japan 2009, Japan2005+50%, Japan2009+10%, Japan2005+75%, Japan2018, Japan2009+50%, Japan2018+25%, Japan2018+50%, Japan2018+75%	Lxx, Cxx, Qxx, Dxx, 3xx, Mxx, 4xx, Rxx, 5xx, 6xx
Euro 6, (approx. harm cap per 1000km) Passenger: $28 Commercial: $36	Japan2005+75%, Japan2018+25%, Japan2009+75%, Japan2018+50%, Japan2018+75%	Dxx, 4xx, Rxx, 5xx, 6xx (tested to JC08 or newer, 2012 age limit as proxy)
Diesel Light Passenger and Commercial Standards		
EU Standard	**Example Japanese Equivalent (there may be other levels of achievement within Japanese standards that will also achieve the desired harm reduction)[6]**	**Example Japanese Emission Codes**
Euro 5, (approx. harm cap per 1000km) Passenger: $68 Commercial: $73	Japan2005, Japan2005+50%, Japan2018, Japan2009, Japan2018+25%, Japan2005+75%, Japan2018+50%, Japan2018+75%	Axx, Lxx, Cxx, 3xx, Fxx, 4xx, Dxx, 5xx, 6xx
Euro 6, (approx. harm cap per 1000km) Passenger: $40 Commercial: $50	Japan2005+75%, Japan2018+50%, Japan2018+75%, (also recommend Japan2018+25% (4xx) for vehicles	Dxx, 5xx, 6xx (tested to JC08 or newer, 2012 age limit as proxy)
Other Japanese standards may also exceed Euro standards, for instance some Japanese commercial vehicle standards that are not included in this submission are noted as having exceptional achievement with regards PM2.5. Industry will continue to work with government to develop a table of equivalencies between international emission standards.		

[5] Note, "+xx%" means xx% reduction from base standard.

[6] Ibid

Additional issues raised in the written submissions

Several other issues were raised by submitters which fell outside of the scope of the questions asked in the consultation but nevertheless provided important information for consideration.

The difference in design between European and Japanese standards

The VIA commented on the differences between the design of European and Japanese emission standards. It stated that Japanese emission standards do not necessarily progress linearly whereas European standards do, and that comparisons using the starting point of European standards may not capture the full potential of Japanese emission standards which have demonstrated significant achievement, even prior to the introduction of the latest European standards. It added that when comparing European and Japanese emission standards, it is important to consider the specific characteristics of each.

The VIA stated that European emission standards are binary, pass or fail, with progressive improvement (reduction in harm) over time. It added that even where the emissions caps do not change across iterations, improvements are found in the supplementary processes such as the way the emissions are tested. It concluded that when it comes to European emission standards, the newer versions are always better.

The VIA stated that in comparison, Japanese emission standards are built upon a very different strategy. It stated that Japanese emission standards are built to last longer but have different levels of achievement built into them from the beginning. This allows even early vehicles to be recognised for exceeding the base standards, something that it not possible for European standards. The VIA concluded that because of this design, it was possible for vehicles with exemplary achievement in an earlier standard to be significantly less harmful than a vehicle that is a low performer to a later standard.

Longer use of Border Inspection as the Point of Compliance sought for used imports

The VIA stated that the point of compliance should be when should be during border inspection when vehicles are approved to enter New Zealand and relevant information is entered into the Landata system. The amendment Rule offered this be the case for a short number of months following the new Rule being adopted; the VIA has sought this to be the case permanently.

Date of first registration is preferred to date of manufacture for used imports

The VIA stated that when purchasing used vehicles to import into New Zealand, importers do not always have access to ‘date of manufacture’, importers do, however, have the ‘date of first registration’. As a result, it recommended that, the use of ‘date of manufacture’ should be changed ‘date of first registration in any jurisdiction’ for used vehicle import requirements or for the application of an emissions standard.

The MTA also stated their preference for the use of the ‘date of first registration’ instead of ‘date of manufacture’.

Compliance for new heavy vehicles: Date of manufacture versus certification for entry into service

The MIA recommended revoking new clause 6.1. as it opposes the point of compliance being when the vehicle is 'certified for entry into service' and request the retention of the existing Rule protocol of using the point of compliance being the 'date of manufacture', as provided in existing clause 2.2(1). This would ensure delays in shipping, and the long assembly and modification process required, do not prevent heavy vehicles from being unable to meet the emissions standards requirements once ready to be certified for entry into service.

s 9(2)(ba)(i)

Mitsubishi and a private individual submitter with motor industry experience also stated it would like to see the amendment Rule follow international convention and start from a "date of Manufacture", not when "certified for entry into service" as is currently proposed. It stated that New Zealand is currently experiencing a vast range of issues such as primary industry protection programs (Brown Marmorated Stink bug), shipping constraints and uncertainties, international production delays and labour shortages that are outside of the industry's control and which can delay or determine when a vehicle might be available to be entry certified. It stated that an arbitrary date of "Certified for entry into service" for a production-controlled engineering and design requirement does not make sense nor does it reflect international convention. It concluded that failure to follow a date of manufacture introduction date, as exists in the current Rule and international standards, would make the amendment Rule extremely difficult to implement and affect a potentially large numbers of vehicles. The associated costs from unsaleable vehicles would be untenable due to these external forces that are beyond every importer's control.

Introducing a rolling age ban for used vehicle imports

In its submission the MTA highlighted that vehicle age is a useful indicator of vehicle specification and technology and noted New Zealand's older than average fleet (average age 15 years) versus other OECD countries. As a result, the MTA recommended that the age control date used in the current amendment Rule, i.e., 'first registration not older than 1 January 2012', be amended to a rolling annual change rather than a static position. It reasoned that a static position would mean New Zealand was still accepting 2012 first registered vehicles in 2027, meaning the vehicles would be up to 15 years old. The MTA added that vehicle performance in general, deteriorates over time, and reliance on a fixed entry criteria (i.e., 2012) may defeat the purpose of what the proposals are trying to achieve.

Transitioning from harmful diesel vehicles to cleaner petrol alternatives

The VIA stated in its submission that the proposals under consultation would continue to allow the import of harmful diesel vehicles whilst removing options for cleaner petrol vehicles. This in turn would reduce the options for those who want or need to transition from a diesel to a less harmful petrol vehicle. It concluded that the result of this will be a disproportionate increase in cost for the harm from vehicle emissions, and therefore subsidies to diesel vehicle owners. It also added that as diesel vehicles cause much more harm than petrol vehicles, it was illogical that New Zealand continued to allow these vehicles to be imported.

The proposed definition of "Higher standard" – Draft Amendment Rule 2.6(5)

> *"Higher standard means an approved vehicle emissions standard that would have applied to the vehicle if the vehicle was certified for entry into service during a later period."*

The VIA stated that this definition in the amendment Rule illustrated the bias the Government has in favouring European standards over emissions standards from other jurisdictions. It stated that the definition of "Higher Standard" should be changed to reflect the desire for an improved level of achievement in a standard (as defined by an increased reduction in harm) as opposed to the chronological order of implementation.

Request to retain older vehicles using the early Japanese test standard (J10/15 testing procedure by creating an age ban)

The VIA reference that the Government has on several occasions indicated it hope to move away from an old Japanese emissions test titled 10/15 mode. The reason being is that this emission test was less accurate that the more modern emission tests. The VIA does not see the need to move away from this earlier emission test unless justified by the adoption of a standard of harm, as it has proposed in its submission. The VIA concludes that the requirement that vehicles be made after, or first registered after, 2012 is not necessary. It added that it is also potentially counterproductive to the need for users of more harmful vehicles to have affordable and less harmful vehicle options available to transition to.

Policies requested to exit high emission vehicles from our fleet

The VIA notes that this standard only applies to imported vehicles at the time of importation; it is not intended to be applied retrospectively to the current fleet. As a result, increasing the turnover of the fleet by removing more harmful vehicles will greatly reduce harm by forcing the transition to lower harm vehicles. The VIA state it had several ideas for how to accomplish this, with their

preferred solution coming under the Clean Car Programme, as it would have the positive effect of reducing harm by promoting that transition to vehicles being filtered by this standard. The VIA stated it hoped to engage government outside the scope of this project on how that can be accomplished.

Benefits of Adopting Euro 7 disputed

The VIA noted the overall benefits of adopting Euro 7 but also stated that there were many aspects of that standard that would not be realised in New Zealand. As a result, it rejected the claims made about the benefits of Euro 7 in the consultation documentation. The VIA cited the example that a benefit of Euro 7 is improved testing to assure emission accuracy in extreme temperatures of up to 45C, the inclusion of base speeds from 145 to 160 km/h, and a double durability requirement which the Government has already stated will not apply.

Unintended consequences of early Euro 6d adoption for Ford

Ford stated in its submission that an unfortunate consequence of being an early adopter of the Euro 6/VI emissions standards for the vehicles it supplies to New Zealand was that its customers were having to pay Clean Car Discount (CCD) fees, when purchasing new vehicles, and the potential Clean Car Standard fees (CCS) fees Ford may be required pay, when importing vehicles into New Zealand. This was because the base measure for Euro 6/VI had changed to a more accurate real-world measure which is significantly higher than it would be for a lower emissions standard. Ford has found this to be the case for its Transit Vans and Ranger model where the CCD/CCS conversion does not accommodate a more accurate base measure.

Ford highlighted that manufacturing costs of the Euro 6/VI standard vehicles are significantly higher, which in combination with the financial penalties issued under CCS and CCD, disincentivised early adoption of Euro 6/VI for the vehicle industry supplying New Zealand. Ford stated it has however proceeded with moving ahead as it believes it is the right thing to do.

Ford asked that this issue was given due consideration in the Clean Car Policy Framework and was included as part of the Ministerial review of CCS 2024. Ford suggested that until the implementation of the new Rule serious consideration should be given to ensure early adopters in the vehicle industry were not disadvantaged and that this could be supported in the form of credit under the CCS and a discount in the CCD to make the adoption of Euro 6/VI vehicles meaningful in the public domain.

Request to remove Real Driving Emission test

Mitsubishi stated that the Real Driving Emission (RDE) test as a component of the amendment Rule a costly and unnecessary step at this early phase of Euro 6 requirements for New Zealand. It added that some vehicle manufacturers might consider the need of a RDE component to be a trade barrier and stop supplying vehicles to the New Zealand market. Mitsubishi recommend removal of the inclusion of RDE in the amendment Rule be removed.

The MTA also noted that if vehicles need to be sent back to Europe for testing, this will be problematic and costly, as New Zealand's market volumes may be insufficient to absorb and spread such costs. This would make considering RDE obligations uneconomic for some brands to remain in the New Zealand market.

Request to remove In Service-Conformity Testing

The MIA and MTA noted that Euro 6d/VI-E requires an in-service conformity test but that there are no suitable facilities that exist in New Zealand to perform this type of testing. The MIA noted that the Rule would need to exempt vehicles from this requirement. However, the MTA and MIA were both unsure if vehicle manufacturers could simply opt-out of in-service conformity testing for vehicles certified to Euro VI-E.

The MTA asked Te Manatū Waka to examine what the practical implications of requiring in service conformity testing across several years after first registration on behalf of the respective manufacturers, and what impacts, if any, will there be for both businesses and consumers. The MTA noted that if it was a requirement, it may be the responsibility of the respective manufacturer, and that the manufacturer might include the cost of compliance within vehicle supply pricing, or simply withdraw if it becomes uneconomic to retain a presence in the New Zealand market as it so small.

The MIA requested further clarification from Te Manatū Waka that an exemption from the European Union had been received and that vehicle manufacturers complying vehicles to Euro 6d/VI-E would not be subject to the requirement for in-service conformity testing for vehicles sold into the New Zealand market (which will inevitably differ in specification from those sold – and tested – in Europe).

New Zealand fuel quality standards must be updated for Euro 6d

The MIA noted in its submission that the current Engine Fuel Specifications Regulations are not at a standard required for WLTP quality, namely due to aromatics parameters (45%) being higher than permitted for optimum running in Euro 6d (petrol) engines (32% maximum aromatics under the WLTP test criteria[7], and a 35% maximum permitted under EU fuel quality standards, EN2284[8]).

It cited most recent report (2020-21) published by Trading Standards on retail fuel quality monitoring[9] which shows that whilst all fuel samples were under the current aromatics cap specified in the regulations, several fuel samples were over the maximum aromatics levels required for WLTP or under EN228.

The MIA concluded that given New Zealand's reliance on imported fuel, there is the very real possibility that batches of fuel could be imported that do not meet the requirements of WLTP, unless there is protection under law. The result being that an inferior fuel could potentially result in significant damage to Euro 6d petrol engines and/or exhaust systems, potentially rendering emissions control systems ineffective, and presenting vehicle owners with costly repair bills.

The MIA stated that it should also be noted that Euro 6d (petrol) engines require 95 octane as a minimum, adding further cost to consumers (approximately 17 cents per litre) which it was concerned may not have been factored into the consultation cost-benefit analysis.

MIA also added that the WLTP test criteria requires an E10 95 octane blend, which is not currently retailed in New Zealand.

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[7] www.transportpolicy.net/wp-content/uploads/2021/08/WLTP-1st-act.pdf (ref. annex XI)

[8] www.envirochem.hu/www.envirochem.hu/documents/EN_228_benzin_JBg37.pdf

[9] https://fuelquality.tradingstandards.govt.nz/about-us/fuel-quality-monitoring-annual-reports/

Access to vehicle repair and maintenance information

The MIA noted in their submission that the definition of Euro 6d in the amendment Rule also refers to 'access to vehicle repair and maintenance information'. It also noted that there is currently no formal process for vehicle importers to provide public access to repair manuals and technical service information (although light vehicle MIA members are signatories to an MIA voluntary code of practice). The MIA stated that it would take considerable time and expense to implement public access portals if this is required to meet Euro 6d obligations and that further clarification was needed on this matter.

An additional standard was requested to be included in the new Rule

In its submission the MIA requested that Indian emissions standard BS6 Phase 2 be added as an acceptable alternative standard in addition to Euro 6d, US Tier 3 and Japan 2018 emission standards. BS6 Phase 2 covers RDE standards and its limit (1.43 for NOx and 1.5 for PM) falls between Euro 6d and Japan 2018 emissions standards. (Euro 6d without OBD functions).

It stated their reasons for this request was that timeframe pressures for new standards, combined with high global demand for product, may impact some New Zealand distributors' positions for priority product allocation from existing manufacturing facilities. Accepting an additional alternative standard could assist distributors with securing products from a new jurisdiction without the complications of additional costs and delays of testing that product to another standard.

The impacts on climate Change and Emissions Reduction Plan Targets

The ICCT stated that switching to Euro 6/VI emissions standards would also offer significant climate benefits, specifically due to the reduction in black carbon emissions, which is a major component of PM and an important short-lived climate pollutant. For the G20 countries that had already adopted Euro VI or equivalent standards, black carbon emissions were projected to lower by 85% to 99% in 2040 compared to the 2020 level.[10]

The NAQWG also stated that the climate effects of fine particulates are also of concern with black carbon particles known to contribute to climate warming.[11] It added that other hazardous air pollutants such as carbon monoxide and oxides of nitrogen can also have an indirect impact on climate warming by boosting the generation of tropospheric ozone which is a greenhouse gas.[12]

Spokes stated that "this is an opportunity to strengthen these proposed changes further to not only reduce harmful NOx and CO emissions but also reduce CO_2 to meet our climate change goals".

Hamilton City Council and Trafinz (The New Zealand Traffic Institute Inc) were both supportive of the proposals but stated that there needed to be greater consideration of how the impacts of the proposals would affect emissions that are harmful to the climate, and how far the proposal would go towards achieving emissions reductions and targets set out in the Emissions Reduction Plan. Both noted that the Euro 6 emission standard sets a legal requirement for a car manufacturer to average CO_2 emissions below 98g/km (compared to 136g/km for the Euro 5 emission standard).

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[10] https://theicct.org/publication/air-quality-and-health-impacts-of-heavy-duty-vehicles-in-g20-economies/

[11] Climate and Clean Air Coalition, Black carbon: https://www.ccacoalition.org/en/slcps/black-carbon

[12] Ananthaswamy A., Smoke Signal, New Scientist, 20 February 2010, p38 – 42.

Without this additional information Hamilton City Council and Trafinz would not comment on the timeframes of the proposed changes. Both added that the response would be dependent on how the proposals impacted meeting the Emissions Reduction Plan and targets, and whether the proposal timeframes are realistic for business and individuals to comply in a way that ensures a just transition to a low-carbon future.

Road Safety Technology

In its submission Spokes noted that vehicles that comply with the most recent standards are also more likely to have a higher safety rating and collision avoidance features that are important to more vulnerable active transport users such as cyclists and pedestrians as the features reduce the likelihood of a crash resulting in death or serious injury. It added that the emission standards should take into account not only the reduction in pollution but also increased safety.

Analysis of information sessions

The aim of the information sessions was to share information regarding the proposals and the amendment Rule with stakeholders.

Five online information sessions, each themed around groups of stakeholders:

- 6 June - Requiring Euro VI for heavy vehicles.
- 8 June - Requiring Euro 6 for light vehicles, motorcycles, and mopeds.
- 12 June - The impacts of implementing the Euro 6/VI emissions standards on health and air quality.
- 15 June - Requiring Euro 6 for vehicles modified for disabled people.
- 16 June - The impacts of implementing the Euro 6/VI emissions standards on equity.

The information sessions were interactive; stakeholders could ask questions and share their views and ideas through anonymous polls and virtual whiteboards. The results of the polls and a summary of the virtual whiteboards boards for each information session have been set out below.

Information Session 1: Requiring Euro VI for Heavy Vehicles:

1: Which of the following best describes you?

Option	Total	Percent
I import new heavy vehicles	19	59%
I import used heavy vehicles	0	0%
I import other vehicles	2	6%
I am not a vehicle importer	11	34%

2: What impact would this proposal have on your ability to supply to New Zealand?

The most common themes in respondents' answers were:

- That Euro VI-E should not be introduced before Australia – moving ahead of Australia, which is where New Zealand sources its model base, will result in a reduction of available models and supply options. It may also impact the supply of vehicles from North America and Japan.
- Euro VI-E should not be implemented – assertions that moving to Euro VI-E from Euro VI-C will limit vehicle supply without improving emissions or health outcomes.
- Euro VI-E does not align with Japan 2016 or US Tier 3 emission standards. These emissions standards are more closely aligned with Euro VI-C.
- Requiring Euro VI stage E creates an uneven playing field between the Euro standards vehicles versus Japan and US.
- Moving to Euro VI-C for used vehicles on 1 November 2025 aligns with Australia and is therefore achievable.
- Alignment with ADR 80/04 (aligned to Euro VI-C) must be continued.

3: Do you think the timeframes for these proposals should be:

Option	Total	Percent
Be brought forward	2	7%
Proceed as proposed	14	45%
Be pushed back	14	45%
Not be implemented at all	1	3%

4: If you think the proposal should be different, how would you improve it?

The most common themes in respondents' answers were:

- That New Zealand should align with Australian timeframes for the introduction of Euro VI – moving ahead of Australia may result in some manufacturers leaving the New Zealand market.
- Euro VI-E should not be introduced – there is very little difference between Euro VI-E and Euro VI-C.
- Alignment with ADR 80/04 must be continued.
- Compliance should be based on date of manufacture not certification for entry into service.
- Further clarification is needed for the requirements of the US standards to be used.
- Further clarification is needed regarding if in-service conformity (ISC) testing will be required in New Zealand and how this will be monitored. One submitter suggested in-service tuning annually (repairs/work on vehicles at time of warrant of fitness to improve the emissions on vehicles) as an alternative.
- Further clarification is needed on whether New Zealand can supply the fuel requirements for Euro VI.

- Further clarification is needed on whether the requirements for US Tier 3 are different from the US Environmental Protection Agency (EPA) standards previously used.
- Compliance should be based on date of manufacture not certification for entry into service.
- New legislation needs to make it illegal to alter the vehicle emission or power output i.e., chipping of engine control unit (ECU).
- In contrast to most respondents, two respondents stated that Te Manatū Waka should proceed with the timeframes and there was no need to follow Australia.

5: How comfortable are you with how we align other international standards with the Euro standards?

Option	Total	Percent
Very comfortable	5	19%
Somewhat comfortable	8	30%
Neither comfortable nor uncomfortable	4	15%
Somewhat uncomfortable	4	15%
Very uncomfortable	4	15%
I'm not familiar with the details	2	7%

6: How would you change how we align other international standards with the Euro standards?

The most common themes in respondents' answers were:

- Alignment with ADR 80/04 must be continued.
- EPA 10 should be used for US Tier 3 and Post New Long-Term Emissions Standards (PPNLT) used for Japan 2016 emission standard.
- The Japan 2016 emissions standard is weaker than and so shouldn't be aligned with Euro VI-C or Euro VI-E as does not require ISC testing, and it doesn't have a particulate number (PN) requirement.
- The not-to-exceed (NTE) emissions testing used for US Tier 3 is only equivalent to the stringency to Euro VI-C.
- Euro VI-E without the requirement for Portable Emission Measurement Systems (PEMS) does not achieve any advantages over Euro VI-C or ADR 80/04.
- "Initially aligns" doesn't mean much when ADR 80/04 only aligns for a couple of years. "Does not align" would be a better description.
- Clarification is required on how Waka Kotahi will manage conformity of production certification requirements for Euro VI-E vehicles if questioned/audited by EU.

7: When should New Zealand implement the Euro VII standard?

Option	Total	Percent
At the same time as Europe (2027)	5	20%
2 years after Europe	8	32%
4 years after Europe	4	16%
6 years after Europe	4	16%
I don't agree with implementing Euro VII	4	16%

8: What do we need to know about implementing Euro VII?

The most common themes in respondents' answers were:

- The NOx and particulate matter (PM) limit values are the same for Steps A through to E. The laboratory test cycle is also the same for Steps A through to E.
- There is no comparable north American standard.
- The focus should be on moving to electric vehicles instead of Euro VII.
- There are currently no equivalent of Euro VII standards planned in Japan.
- US 2027 rules may be considered equivalent to Euro 7 in terms of stringency.
- Requiring Euro VII or other equivalent international standard could be cost prohibitive and cause supply constraints.

Information Session 2: Requiring Euro 6 for light vehicles, motorcycles, and mopeds:

1: Which of the following best describes you?

Option	Total	Percent
I import new light vehicles	19	73%
I import new motorcycles and/or mopeds	0	0%
I import used light vehicles	0	0%
I import used motorcycles and/or mopeds	0	0%
I import other vehicles	0	0%
I specialise in buying other vehicles	0	0%
I am not a vehicle importer	7	27%

2: Do you think the timeframes for the proposal for light vehicles should be:

Option	Total	Percent
Be brought forward	1	55%
Proceed as proposed	9	41%
Be pushed back	12	55%
Not be implemented at all	0	0%

3: Do you think the timeframes for the proposal for light vehicles should be:

Option	Total	Percent
Be brought forward	2	12%
Proceed as proposed	11	65%
Be pushed back	3	18%
Not be implemented at all	1	6%

4: What impact would this proposal have on your ability to supply to Aotearoa? If you think the proposal should be different, how would you improve it?

The most common themes in respondents' answers were:

- That New Zealand should align with Australian timeframes for the introduction of Euro 6. Moving ahead of Australia would reduce the supply of new vehicles and reduce choice for consumers. New Zealand is too small to have its own individual vehicle specifications.
- It is not possible to meet the timeframes to meet Euro 6d from 1 Feb 2025, for new vehicles. To meet this requirement new models produced would need to start meeting Euro 6d from 1 August 2024 – this does not provide the industry enough lead in time (less than 12 months).
- In contrast to the majority of respondents, two respondents supported the changes with one stating that manufacturers would move to meet the new emissions standards as required.

5: How comfortable are you with how we align other international standards with the Euro standards?

Option	Total	Percent
Very comfortable	2	11%
Somewhat comfortable	10	53%
Neither comfortable nor uncomfortable	3	16%
Somewhat uncomfortable	2	11%
Very uncomfortable	1	5%

I'm not familiar with the details	1	5%

6: How would you change how we align other international standards with the Euro standards?

The most common themes in respondents' answers were:

- Support for alignment with UNECE R83.
- Further clarification is needed is needed on whether EPA certificates will be acceptable evidence for US Tier 3.
- Request to change Japan 2018 Low Harm petrol emission standard to Japan 2018 (any code); the same emissions standard that will be required for diesel.
- Further clarification is needed regarding what certification Bin[13] levels are acceptable for US Tier 3.
- Support for alignment with ADR.
- Further clarification is needed regarding if Real Driving Emissions (RDE) and In-service conformity (ISC) testing will be required, as part of the new emissions standards, and how this will be monitored.

7: When should Aotearoa implement the Euro 6e standard?

Option	Total	Percent
At the same as possible (2024)	2	14%
2 years after Europe	3	21%
4 years after Europe	1	7%
6 years after Europe	3	21%
I don't agree with implementing Euro 6e	5	36%

Poll 8: When should Aotearoa implement the Euro 7 standard?

Option	Total	Percent
At the same time as Europe (2025)	1	6%
2 years after Europe	3	19%
4 years after Europe	1	6%
6 years after Europe	5	31%
I don't agree with implementing Euro 7	6	38%

[13] Manufactures can choose to certify each car model to one of EPA's smog rating standards, also known as "bins," but the automaker's fleet must meet a specified average. Vehicles certified to a specific bin cannot exceed the amount of pollution specified for that bin.

9: What would you need to do in order to achieve Euro 6e and Euro 7?

The most common themes in respondents' answers were:

- Manufacturers need longer lead times for the Australian and New Zealand markets, as they are smaller and therefore will follow European introduction.
- Euro 7 includes other requirements that are not relevant for the New Zealand market. This increases the cost and complexity of manufacture and so it may not be possible to gain Euro 7 approval for a New Zealand vehicle due to this difference in specification.
- New Zealand is too small as market to dictate manufacturers decisions. Alignment with Australia is needed otherwise it will become cost prohibitive for industry to supply to New Zealand.
- A significant cost increase which will be passed on to customers.
- New Zealand needs to introduce standards for EVs and to see how this compares to Euro 7 requirements.
- There needs to be a fuel standard review to ensure high quality fuel is available throughout New Zealand.
- Risks that some manufacturers will leave the New Zealand Market.

Information Session 3: The impacts of implementing the Euro 6/VI emissions standards on health and air quality:

1: Which of the following best describes you?

Option	Total	Percent
I work in health and/or air quality	6	43%
I am researcher in health and/in air quality	2	14%
I import new vehicles	4	29%
I import used vehicles	1	7%
I specialise in buying other vehicles	0	0%
None of the above but I have an interest in health and air quality	1	7%

2: Are you concerned or unconcerned about the level of transport emissions affecting human health in Aotearoa? Please explain why.

The most common themes in respondents' answers were:

- Air pollution kills or harms many people in New Zealand.
- One respondent highlighted the poor control of toxins from emissions in vehicle workshops and garages for those working in the vehicle servicing industry.
- There were concerns about the aging fleet in New Zealand contributing to poor air quality.

- There were concerns that tampering is taking place and not regulated or enforced.
- There were concerns that New Zealand is behind most developed nations in terms of emissions standards.
- There was concern that the Government is choosing not to reduce harms by delaying the introduction of available technologies.
- There were concerns that the number of vehicles in the fleet has increased over time, especially diesel vehicles.
- One respondent suggested investigating alternative fuel including synthetic fuels and hydrogen to reduce noxious emissions.
- There was interest in helping low- and middle-income people and families buy an EV.

3: Do you think the timeframes for the proposal for light vehicles should be:

Option	Total	Percent
Be brought forward	5	38%
Proceed as proposed	5	38%
Be pushed back	3	24%
Not be implemented at all	0	0%

4: What impact would these proposals have on air quality in Aotearoa? If you think the proposals should be different, how would you improve it?

The most common themes in respondents' answers were:

- The earlier the proposal can be implemented the faster air quality will improve in New Zealand.
- Support for bringing forward the proposal timeframes, as far as practically possible, due to concern that New Zealand had already fallen behind on introducing stricter emissions standards.
- Support for balancing costs with the benefits for bringing forward the proposal timeframes.
- Support for reducing environmental and human health harms.
- Support for considering the impact of the proposals in conjunction with other policy development work aimed at climate change mitigation/decarbonisation.
- The new emissions standards will reduce air pollution gradually overtime however older vehicles, that are already in circulation in the fleet, could delay progress.
- The improvement in air quality will be significant especially for those in lower-socioeconomic demographics and who live near busy roads.
- Support for jumping from Euro 4, for used vehicles, straight to Euro 6 and skipping Euro 5.

- Internal testing needs to be updated rather than based on smoke at warrant of fitness testing (NOx gases are colourless and therefore not visible).
- Support for using Hydrogen for heavy vehicles noting that this may not need same standards to achieve a similar outcome.
- Support for the move to EVs as vehicle stay in the fleet for a long time which will slow down progress in reducing air pollution.
- Support for banning ICE vehicles.
- Support for not moving to Euro VI-E as it will not help to improve air quality.
- Diesel technology is moving slower than we would expect with our light fleet - incentives for change should be considered i.e., use of technology and compliance.
- Support for new emissions standards but noting that it needs to align with manufacturers ability to supply. If vehicles become more expensive people will hold onto their older, more polluting vehicles for longer, which will increase air pollution.
- There needs to be consideration the impact of diesel particulate (elemental carbon).
- There must be consideration as to how legislation will enforce the new emissions standards.

5: When should Aotearoa implement the Euro 7/VII standard?

Option	Total	Percent
At the same time as Europe (2025 for light vehicles and 2027 for heavy vehicles)	2	14%
2 years after Europe	7	50%
4 years after Europe	4	29%
6 years after Europe	0	0%
I don't agree with implementing Euro 7/VII	1	7%

6: What do we need to know about implementing Euro 7/VII?

The most common themes in respondents' answers were:

- The public need to know that we are doing this to improve air quality and reduce morbidity. They will be more likely to support the new emissions standards if it doesn't affect the price of freight goods and they can access support to replace their old vehicle.
- Further clarification is needed to understand testing will be required for EV's, in the future.
- Cost benefit analysis modelling on the impacts of introducing Euro 7/VII so to better understand if there are any improvements in health and social costs.
- Allowing time to evaluate the impact of Euro 6/VI implementation including from an equity perspective.

- Ensure alignment with other policy that relates to EVs.
- Implementation of Euro 6/VI should be prioritised first.
- There is a need for a mechanism to force in-service emissions tests on older vehicles so poor performers can be scrapped.

7: What impact would Euro 7/VII have on air quality in New Zealand?

The most common themes in respondents' answers were:

- Euro 7/VII is fuel agnostic which should be introduced for emissions standards in New Zealand as soon as possible. However, other aspects of Euro 7/VII such as testing in temp extremes (up to 40C), double durability requirements (which New Zealand isn't going to adopt), and increased speeds (160km/h) are not relevant to New Zealand. Instead of introducing Euro 7/VII New Zealand should just remove harm exemptions for diesels.
- Euro 7 standards include the emissions from brake and tyre wear, which is likely a by-product of EVs. It's important for New Zealand to keep inline with the Euro standards to avoid becoming a dumping ground for older technology vehicles.
- EVs for light and heavy will be common for new vehicles in a decade so the biggest issue is how to get rid of the old or poor performing vehicles in the current fleet.

8: Is there anything we haven't covered today that you think Te Manatū Waka should be progressing to reduce emissions? And how could other organisations contribute?

The most common themes in respondents' answers were:

- Balancing safety against EV use as many have noise generators inactivated which will promote pedestrian injury.
- In-service emissions tests and scrappage schemes.
- Support Councils to replace light vehicles with electric bikes, etc that use urban space more efficiently with no emissions.
- Investigating, promoting hydrogen HGVs.
- Introducing a subsidy for low- and middle-income New Zealanders to change their vehicles including low-cost loans.
- A timeline to ban second-hand imports that are not EVs.
- Support car share arrangements so people have good mobility options without having to own personal vehicles.
- Other countries have plans to end sale of ICE by the end of this decade or sometime next decade.
- Work with other agencies in advocating for modal shift, active transport, and urban design to support reduction of vehicle use - a concerted cross agency effort needed.
- Concentrate on higher km travelling diesel vehicles, low km travelling petrol vehicles are less relevant.
- Consideration needs to be given to compliance and enforcement.

- Incentives to reduce number of car/truck trips and provide alternatives such as replace by public transport and rail.
- Heavily promoting low emission transport sources (buses) and bikes/bike lanes for commuting, at the expense of private commuter vehicles.
- Investigating how best to decrease median age of NZ vehicle fleet i.e., scrap old, inefficient vehicles.

Information Session 4: Requiring Euro 6 for vehicles modified for disabled people:

For the information session on requiring Euro 6 for vehicles modified for disabled people a different format was followed as polls and virtual whiteboards are not accessible for those who used screen readers. Instead, an informal discussion was held alongside a presentation setting out the proposals for requiring Euro 6 for vehicles modified for disabled people.

Several attendees noted that under the proposals for used vehicles modified for disabled people, in 2028, Toyota Hiace Welcabs vehicles could no longer be imported into New Zealand as these vehicles would not meet the proposed Japanese emissions standard (Japan 2018 Low Harm).

Due to a lack of funding and other restrictions, used Toyota Hiace Welcabs vehicles are currently the only affordable van option for wheelchair users, who cannot drive, and who rely on Lotto funding, or are self-funded, to be able to afford a modifiable vehicle. In contrast, disabled people funded by ACC have the full cost of their modified vehicles covered by ACC, and can generally purchase brand new disability vehicles which already meet Euro 6 standards today.

Attendees noted that under the current proposal only new low emission vans, or vans less than 4 years old with low emissions profiles would be allowed to be imported in New Zealand. As a result of the lack of funding, Lotto funded, or self-funded, vans are often second-hand, 10-12 years old Toyota Hiace Welcabs and have odometers in excess of 150,000 km. The proposals would mean Lotto funded/self-funded applicants would likely have no affordable options to purchase modifiable vans by 2028.

ACC stated that the timeframes for new vehicles modified for disabled people (the same as those for new light vehicles) seemed achievable but would depend on the manufacturers ability to meet the new emissions standards. ACC added that the vehicles it sourced from Europe did not currently meet Euro 6 emissions standards.

Some of attendees stated that the current proposals for vehicles modified for disabled people would further increase the disparity in the level of support provided to disabled people who rely on ACC funding for disability vehicles, and those who are self-funded or are awarded Lotto funding. Attendees also added that that transport options for disabled people, in New Zealand, are severely limited e.g., accessible public transport and wheelchair taxis and that this would further compound the transport inequity experienced by disabled people; preventing them from being able to live their lives and effectively engage in society.

Information Session 5: The impacts of implementing the Euro 6/VI emissions standards on equity:

1: Which of the following best describes you?

Option	Total	Percent
I work in transport equity	0	0%
I am a researcher in transport equity	1	13%
I import new vehicles	4	50%
I import used vehicles	1	13%
I specialise in buying other vehicles	0	0%
None of the above but I have an interest in transport equity	2	25%

2: What are your concerns about the inequity of harmful emissions in Aotearoa? Please explain how you would address this:

The most common themes in respondents' answers were:

- Concerns regarding electricity supply and increased cost as the number of electric cars in New Zealand increases – need to ensure that electricity remains affordably for those of lower socioeconomic status.
- Concerns about the inequitable impacts on Pasifika people.
- More research is needed to understand if the source of air pollution comes from cars owned and driven within Pasifika communities or from vehicles being driven through those communities.
- As access to more harmful vehicles is restricted options for less harmful vehicles need to be maintained. This has two benefits; it increases the chance that the user of a more harmful vehicle has an option to move to and it keeps costs for those less harmful vehicles down.

3: What are your concerns about the costs of requiring the Euro 6/VI for new and used vehicles imported into Aotearoa? Please explain how you would address this?

The most common themes in respondents' answers were:

- There needs to be affordable alternatives to car use so that direct financial effects are not regressive, especially for large Pasifika families.
- Vehicle manufacturers getting around standards in various ways, i.e., "work utes" or "farm vehicles", and not having to meet safety standards i.e., VW safety scandals.
- Most of the air pollution comes from second hand vehicles already in the country – how will this be resolved?
- Support for bringing the proposal timeframes forward. New Zealand should source vehicles from Europe instead. The reluctance from manufacturers will be mostly related to addition costs.

- Used import vehicle cost is drastically affected by availability, typically the older the vehicle, the cheaper it is. By applying the requirement to meet Japan 2018 Low Harm, the pool of available vehicles will reduce and lead to a significant cost increase.
- I was impacted by the conclusion from the information session on disability vehicles. The attendees, who largely represented the needs of disabled people, questioned whether disabled people would welcome their slight health improvements at the cost of being excluded from society because they could no longer afford transport options.

4: Do you think the timeframes for the proposal for light vehicles should be:

Option	Total	Percent
Be brought forward	4	57%
Proceed as proposed	1	14%
Be pushed back	2	29%
Not be implemented at all	0	0%

5: What impact would these proposals have on transport equity in Aotearoa? If you think the proposals should be different, how would you improve it?

One respondent answered:

- It would depend heavily on investments in affordable alternatives, such as public and active transport, and the ability to implement these alternatives.

6: When should Aotearoa implement the Euro 7/VII standard?

Option	Total	Percent
At the same time as Europe (2025 for light vehicles and 2027 for heavy vehicles)	1	11%
2 years after Europe	3	33%
4 years after Europe	3	33%
6 years after Europe	2	22%
I don't agree with implementing Euro 7/VII	0	0%

7: What impact would Euro 7/VII have on transport equity in Aotearoa?

One respondent answered:

- Euro 7/VII should be included in the proposal but give clear long-term date – 2030 or 2040 – so that New Zealanders know what to expect.

8: Is there anything we haven't covered today that you think Te Manatū Waka should be progressing to reduce the inequity of harmful emissions?

The most common themes in respondents' answers were:

- There should be a review, after the new emissions standards have been introduced, to ensure that there are no 'unknown' factors that have equity impacts.
- Recommendation that the implementation monitoring framework is expanded to look at the impacts on equity - acknowledging the statement in the RIS that the equity impact assessment could have been strengthened.
- Impacts on equity are reliant on other legislative changes and mitigations to avoid unintended consequences on priority populations. It is important that the impacts from this policy change are viewed alongside other associated or linked policies, e.g., public transport planning etc.
- It is frustrating to keep getting asked when New Zealand should implement Euro 7/VII without specifying which requirements of Euro 7/VII would be implemented. If, we are only talking about removing extra subsidies for diesels and restricting ammonia, then it should be implemented. If we are going to have to prove in-fleet durability for x number of years, then more work will be required before we move forward.

Te Kāwanatanga o Aotearoa
New Zealand Government