

Canterbury

District Health Board

Te Poari Hauora o Waitaha

Submission on Moving the light vehicle fleet to low-emissions: discussion paper on a Clean Car Standard and Clean Car Discount

To: Ministry of Transport

Submitter: Canterbury District Health Board

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Proposal: The Clean Car Standard would require vehicle importers to bring in progressively more fuel efficient and electric vehicles. The Clean Car Discount (which is a feebate scheme) would make fuel efficient and electric vehicles more affordable for Kiwis to buy. Both aim to help New Zealand significantly reduce the emissions from transport, and also result in fuel savings for motorists.

SUBMISSION ON MOVING THE LIGHT VEHICLE FLEET TO LOW-EMISSIONS: DISCUSSION PAPER ON A CLEAN CAR STANDARD AND CLEAN CAR DISCOUNT

Details of submitter

1. Canterbury District Health Board (CDHB).
2. The Ministry of Health requires the submitter to reduce potential health risks by such means as submissions to ensure the public health significance of potential adverse effects are adequately considered during policy development.

Details of submission

3. We welcome the opportunity to comment on the Moving the light vehicle fleet to low-emissions: discussion paper on a Clean Car Standard and Clean Car Discount.

General Comments

4. Transport is an important determinant of health as how people travel and connect influences a number of health outcomes¹, not just improved respiratory health from reduced emissions. Further, reduced emissions impact upon environmental health which in turn, impacts directly on human health². Implementing policy such as this and working together to achieve commitments under the Paris Agreement needs to be a priority for all sectors (including transport) in order to achieve emissions targets and reduce the impact of Climate Change on human health.
5. The CDHB supports the goal of cleaner vehicles and these policies in principle, however are unable to comment on the technical aspects of these proposals which require specific expertise in energy and climate science and knowledge as to the operational implications of the application of discount and feebate schemes. The CDHB has however identified a number of potential unintended consequences which need to be mitigated in order to ensure these policies achieve equitable outcomes and do not further disadvantage certain groups in New Zealand.

¹ Genter, JA., Donovan, S. & Petrenas, B. 2008. *Valuing the health benefits of active transport modes*. University of Auckland: Auckland.

²Royal Society Te Apārangi. 2017. *Human Health Impacts of Climate Change for New Zealand*. Retrieved from: <https://royalsociety.org.nz/assets/documents/Report-Human-Health-Impacts-of-Climate-Change-for-New-Zealand-Oct-2017.pdf>

Specific comments

6. The needs of rural communities and some professions (such as trades) for which there are not viable EV alternatives need to be considered. Such households and small businesses are likely to be disadvantaged by the feebate aspect of this policy as the type of vehicles required for their vocations do not have affordable low emission alternatives. The CDHB supports a discount for purchase of low emission vehicles, but not the generalised application of fees for higher emissions vehicles as this would disproportionately disadvantage rural communities and those who require trades vehicles.
7. Additionally, infrastructure to support use of EVs in rural communities is very limited, yet would be vital to support any shift to low emission vehicles. Those living and working in rural communities typically travel long-distances each day and so would require fast-charging facilities to ensure it is practical to use EVs. Such facilities would need to be publically available, and installation subsidised (such as additional grants for DC fast chargers).
8. There is the danger of reducing transport choice for low-income households by applying this standard and discount scheme. As the discussion document notes, the capital cost of cars coming into New Zealand is likely to increase and are unlikely to be an affordable option for such households, however concurrently, the price of second-hand cars in New Zealand may also rise given increased demand for these comparatively cheaper vehicles. This will result in reduced transport choice for low income households, particularly those communities who do not have access to safe active transport routes or quality public transport services. The suggestions made in the social impact assessment for low-income households are therefore not realistic for many of those who experience significant transport disadvantage and live outside of the major urban centres.
9. The CDHB questions the appropriateness of the statement within the social impact assessment: *“Therefore, the share of the direct impacts of the VFES policy on low-income households would be smaller than the impacts on the remainder of households.”* Low income households already experience significant transport disadvantage; without careful mitigation this policy is likely to place such groups at an even greater disadvantage. The significant disadvantage to a comparatively small, but disproportionately vulnerable group is not concordant with the principle of

proportional universalism which requires action **proportionate** to needs and levels of disadvantage in a population. CDHB recommends the use of the Health Equity Assessment Tool³ to ensure equity issues are proactively considered in this policy.

10. The CDHB recommends that consideration is given to ensuring ethical sourcing and safe extraction of lithium and other products associated with EV batteries, as well as their appropriate disposal.
11. The CDHB recommends that the final policy is agile to allow for evolution of other technologies such as other fuel sources (for example, biofuels) to be included as they may be less cost prohibitive than EV batteries.
12. The CDHB recommends that government vehicle fleets be eligible for the discount scheme. Purchasing EVs is currently cost prohibitive for many DHBs given budgetary constraints and availability of cheaper second-hand cars. Such discounts for government fleets would contribute significantly towards the aims of these policies given the need for light vehicle use to deliver health care, particularly in DHBs like Canterbury where there are significant distances to travel.

Conclusion

13. Thank you for the opportunity to submit on Moving the light vehicle fleet to low-emissions: discussion paper on a Clean Car Standard and Clean Car Discount.

Person making the submission

A handwritten signature in dark ink, appearing to read 'A Stevenson', with a large, sweeping horizontal stroke across the top.

Dr Anna Stevenson

Public Health Specialist

Date: 20/08/2019

Contact details

Emma Kenagy

³ <https://www.health.govt.nz/publication/health-equity-assessment-tool-users-guide>

For and on behalf of
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