

From: [REDACTED]
To: [Clean Cars](#)
Cc: [REDACTED]
Subject: Moving the light vehicle fleet to low-emissions---Discussion paper on a Clean Car Standard and Clean Car Discount
Date: Sunday, 18 August 2019 9:54:03 PM
Attachments: [FW Climate Change.msg](#)
[M191106 Reply from Hon Julie Anne Genter Associate Minister of Transport..msg](#)

Dear MOT

The following submission is made in lieu of answering the individual sections of the paper as I wish to make a number of specific points. In general I am totally supportive of both Clean Car Standard and Clean Car Discounts.

1. Clean Car Standard
 - a. Numbers from manufacturers WRT to CO2 emissions should not be taken as sacrosanct. VW was a shining example of why such numbers cannot be trusted
 - b. Need for vehicle testing entering New Zealand because:
 - i. Manufacturers deliberately produce wrong/confusing numbers
 - ii. Only 43% of used cars entering New Zealand are less than 10 years old and so even if the manufacturer's CO2 number is correct at time of manufacture age will have worsened the result
 - iii. Testing should be done in New Zealand using tail pipe or other suitable testing method
 - c. Same equipment should also be used at WOF testing stations as part of annual WOF---this was previously suggested to Minister by me and rejected -- correspondence attached. Your paper further strengthens my resolve to seek vehicle testing
 - d. No standards to be applied to resale of vehicles---my proposal would cover this by means of annual WOF
 - e. NPV of \$2.4B---over what period is this?---needs to be made clear
 - f. Weight adjustment---this is a double edged sword. Batteries in EVs are disproportionally heavy. Should the battery weight be netted off total weight of EVs?
1. Clean Car Discount
 - a. RUC's introduced for EVs to coincide with Feebate
 - i. Of pure EV, PHEV and Hybrid which will be included within RUC? (if PHEV's are not included in RUC's then the following can be discounted)
 - ii. The definition of EV according to NZTA. Your vehicle may be exempt from road user charges (RUC) if: it is an electric RUC vehicle whose motive power is derived wholly or partly from an external source of electricity,
 - iii. By definition RUCs would encompass pure EV's and PHEVs and not Hybrids
 - iv. Despite manufacturer claims PHEVs only travel a comparatively short distance on pure battery typically 20 to 30 KMs before reverting to hybrid
 - v. To charge RUC on PHEV's will kill the PHEV market as owners will be required to purchase both petrol at a higher price (than diesel) plus RUCs. This will be punitive and make running PHEVs more expensive than diesel cars. As the (very happy) owner of a Mitsubishi Outlander PHEV and a former owner of an Outlander diesel I can assure the number of litres per 100 KM's is almost identical on any journey over 150KM's this being approximately 6.5L/100Kms. If RUC's are introduced on PHEVs I will never buy (as planned) another PHEV along with many more like me

I would very much appreciate receiving a response to my above questions above. Very happy to take any e-mail questions or receive call on the number below

Best regards

JM

CC --Mitsubishi New Zealand

John Mitchell

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