

Ministry of Transport
Land Transport (Clean
Vehicles) Amendment
Bill

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on *Transport and Infrastructure Committee's Land Transport (Clean Vehicles) Amendment Bill*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General Comments

3. NMH strongly supports the Bill that aims to achieve a rapid reduction in carbon dioxide emissions from light vehicles imported into New Zealand. Greenhouse gas emissions from the transport sector make up about 20% of New Zealand's total greenhouse gas emissions each year. The 2012 Health and Air Pollution in New Zealand (HAPINZ) report found that harmful emissions from vehicles cause 256 premature deaths (with social costs of \$934 million) annually in New Zealand. Reducing emissions of greenhouse gases through better transport and energy-use choices can result in improved health.¹
4. NMH notes that New Zealand is one of only three developed countries that does not have regulations on vehicle emissions quality², and as a result, has one of the most fuel inefficient and polluting fleets of any OECD country. This could have serious implications on the health and wellbeing of New Zealanders, including high rates of asthma, respiratory illnesses, and lung cancer. Children, the elderly, and low income families are particularly vulnerable to poor air quality.³ However, the introduction of EV and hybrid vehicles will reduce in fleet emissions including PM2.5 (particulate matter with a size of less than 2.5 micron) that may improve people's respiratory health and quality of life especially people who live near busy roads.
5. This Bill complements the current rebate scheme that commenced in July to increase electric vehicles (EVs) and low-emitting vehicles in New Zealand's fleet,

¹ <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

² [Clean Cars | Ministry of Transport](#)

³ WHO (2014). FAQ: Ambient and Household Air Pollution and Health.

https://www.who.int/phe/health_topics/outdoorair/databases/faqs_air_pollution.pdf

and is a crucial step towards meeting the emission targets agreed to in the Paris agreement, and those set out in the Climate Change Response (Zero Carbon) Amendment Act. The scheme can lead to significant improvements in health and wellbeing in New Zealand by positively impacting air quality and reducing noise pollution.

Specific Comments

6. NMH commend the government for developing a proposal to increase EVs in New Zealand's light fleet. However, the range for electric vehicles is limited,⁴ research has shown that the biggest inhibitor to buying plug-in vehicles is the limited driving range before a charge is needed⁵. To boost the use of EVs, the number, locations and types of chargers need to be greatly increased.
7. There must be a comprehensive plan to map and scale up EV charging infrastructure throughout the country. This is particularly important in the South Island where there can be long distances between towns.
8. NMH is currently transitioning to lower emission vehicles, the fleet currently contains at least 30 hybrids and 5 electric vehicles. Furthermore, a fund for public charging infrastructure at sites such as hospitals, libraries and councils could be considered to increase greater uptake.
9. *Clause 7, section 172 Definition of light motor vehicles (type A and B vehicles):* We strongly advise that the "constructed primarily for the carriage of passengers" be removed from both definitions and that the definition be based purely on seat numbers and mass. This is to avoid the situation where dual-purpose vehicles such as double-cab utes would be able to be excluded from the legislation.
10. *Clause 7, Section 174 Measurement and determination of carbon dioxide emissions:* NMH strongly recommends that the measurement and the determination of carbon dioxide emissions of an imported light vehicle be assessed by an independent agency, either national or international rather than the vehicle manufacturer themselves.

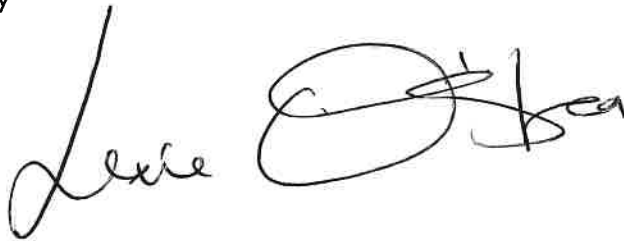
⁴ <https://driveelectric.org.nz/individuals/ev-models-and-where-to-buy/>

⁵ Bonges, H., Lusk, A., (2016) *Addressing electric vehicle (EV) sales and range anxiety through parking layout, policy and regulation*. Transportation Research, Policy and Practice.

Conclusion

11. NMH thanks the Transport and Infrastructure Committee for the opportunity to comment on *Land Transport (Clean Vehicles) Amendment Bill*.
12. NMH believes that climate change is a major public health concern and commend the Government for its action in reducing greenhouse gas emissions. This will have significant health co-benefits. NMH is supportive of the current *Land Transport (Clean Vehicles) Amendment Bill* and recommends that this Bill incorporates the recommendations above.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lexie O'Shea', written in a cursive style.

Lexie O'Shea
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