

3 November 2021

OraTaiao: New Zealand Climate & Health, Incorporated  
Auckland, New Zealand  
[www.orataiao.org.nz](http://www.orataiao.org.nz)

### **Submission on Land Transport (Clean Vehicles) Amendment Bill 2021**

Committee Secretariat  
Committee Secretariat  
Transport and Infrastructure Committee  
Parliament Buildings  
Wellington

Tēnā koe

OraTaiao: NZ Climate and Health Council commends the aims of this Bill, namely to increase the supply of and demand for zero- and low-emissions vehicles for purchase in New Zealand. We advise the Bill be strengthened significantly in some important areas however. Our recommendations are as follows:

- 1- Clause 4, section 1: Definition of light motor vehicles. We recommend this expressly state an **unladen** gross vehicle mass of not more than 3,500kg.
- 2- 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. This dual-purpose nature has already been used to avoid defining double-cab utes as “cars” by the [IRD](#) (pp 22-23) in their rules around Fringe-Benefit Tax.
- 3- Clause 7, section 174: We strongly recommend that the carbon dioxide emissions of an imported light vehicle be established by an independent agency, either national or international rather than the vehicle manufacturer themselves.
- 4- Clause 7, section 175: We support the reducing targets for carbon dioxide emissions from 2023-2027 but recommend a more rapid reduction. Furthermore we recommend that an absolute ceiling be imposed on maximum emissions for individual vehicles, as well as an average emission per importer. We recommend this absolute ceiling sink at the same or faster rate than then average target.

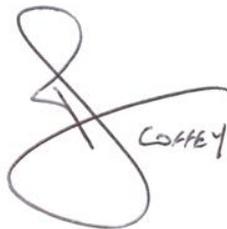
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- 5- Clause 7, section 177(2) & 182(2): We support the charges for excess carbon dioxide emission but recommend they be significantly raised in order to act as a proper deterrent.
- 6- Clause 7, sections 178 & 183: We do not support the banning of overachieved carbon dioxide emissions for more than 1 year.
- 7- Clause 7, sections 178 & 183: We do not support the long-term right to transfer carbon dioxide credits to other importers. As an interim measure, it would be reasonable to allow transfer for the first 2 years of the scheme at a ratio of 0.5 credits for each saved.
- 8- Clause 7, sections 195 & 197A: We support the introduction of fines but recommend they be significantly increased, with the fine ceiling being raised to act as a proper deterrent.

Overall, we are encouraged that the Bill will begin the process of reducing the carbon dioxide emissions of our vehicle fleet, but it needs significant strengthening to definitively bring this about.

Nāku noa, nā

A handwritten signature in blue ink, consisting of a large, stylized loop followed by a horizontal line and the name 'COFFEY' written in capital letters.

Dermot Coffey

Co-convenor, OraTaiao: NZ Climate and Health Council

## About OraTaiao

OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, fair, and Tiriti-based climate action in Aotearoa; we recognise the important co-benefits to health, well-being and fairness from strong and well-designed mitigative policies. We honour Māori aspirations, are committed to the principles of te Tiriti o Waitangi, and strive to reduce inequities between Māori and other New Zealanders.

We are guided in our practice by the concepts of kaitiakitanga (guardianship), kotahitanga (unity), manaakitanga (caring), and whakatipuranga (future generations).

OraTaiao has grown over a decade to more than 700 health professionals concerned with:



NZ Climate & Health Council

- The negative impacts of climate change on health, well-being, and fairness;
- The gains to health, well-being, and fairness that are possible through strong, health-centred climate action;
- Highlighting the impacts of climate change on those who already experience disadvantage or ill-health (i.e., equity impacts);
- Reducing the health sector's contribution to climate change.

As well as individual members, we are backed by 19 of New Zealand's leading health professional organisations for our Health Professionals Joint Call to Action on Climate Change and Health (see [https://www.orataiao.org.nz/friends\\_and\\_supporters](https://www.orataiao.org.nz/friends_and_supporters)). This support includes the New Zealand Medical Association, the New Zealand Nurses Organisation and the Public Health Association, plus numerous specialist colleges. Together, these organisations represent tens of thousands of our country's health workforce.

As an organisational member of the Board of the Global Climate & Health Alliance, we work with a worldwide movement of health professionals and health organisations focused on the urgent health challenges of climate change - and the health opportunities of climate action. OraTaiao signed the Doha Declaration on Climate, Health and Wellbeing of December 2012, which reflects this international perspective.