

Monday 12th August 2019

Ministry of Transport  
PO Box 3175  
WELLINGTON 6140

## **SUBMISSION ON THE CLEAN CAR STANDARD AND CLEAN CAR DISCOUNT**

### **Introduction**

1. The Dunedin City Council (DCC) welcomes the opportunity to submit feedback on the Government's proposed Clean Car Standard and Clean Car Discount policies. This submission outlines the DCC's support for the proposals.

### **Submissions**

2. The DCC supports the Government's proposal to introduce a Clean Car Standard and a Clean Car Discount scheme. As highlighted by the consultation document, the need to incentivise the supply and purchase of low-emission light vehicles into the domestic fleet will help reduce the transport sector's rapidly growing emissions profile and transition New Zealand to a net zero carbon economy.
3. The DCC supports the emissions target of 105 grams of CO<sub>2</sub> per kilometre by 2025 for the proposed Clean Car Standard. This could reduce emissions by up to 5.1 million tonnes over 2020–2041 and this strongly aligns with the DCC's renewed commitment to being net carbon zero by 2030, with transport being a significant source of Dunedin's emissions profile.
4. As the consultation document mentions, the buying and selling of vehicles already in the existing vehicle fleet New Zealand wide will not be affected. The DCC acknowledges that those on low-incomes may have a reduced uptake of new vehicles and will only enjoy the economic benefits of reduced costs at the pump once electric vehicles (EVs) have entered the second-hand domestic fleet.
5. The benefits from the proposal have positive implications for Dunedin's air quality and contribute to stability in volatile fuel prices for Dunedin residents. These clear benefits would contribute positively to the objectives within the DCC's Social Wellbeing Strategy and the Dunedin City Integrated Transport Strategy.

6. The proposed Clean Car discount scheme strategically accords with the DCC's embrace of EVs and in improving the energy efficiency in transport fuels as expressed by DCC's Energy Plan 1.0. Dunedin has already started the journey in this space with the highest number of EVs per head of population and is working to deliver more charging stations to add to Dunedin's already significant charging infrastructure.
7. The DCC supports the Government's long-term goal to phase stricter targets in to help drive the transition to a low-emissions vehicle fleet. The sustainable management of natural resources and reduction of greenhouse gas emissions are key aspects of Te Ao Tūroa – The Natural World, Dunedin's Environmental Strategy.
8. The DCC urges the Government to look at ways they can incentivise the supply of vehicles that would be suitable in rural and trade related industries that might be in the discount bands (e.g. through whole-of-government purchasing schemes).
9. The DCC would also like to see that Government ensures charging or alternative fuel options are rolled out nationally to ensure availability to all drivers.

## **Conclusion**

10. The DCC looks forward to more EVs on New Zealand roads in the face of climate change and the immediate need to drastically reduce emissions and in joining the rest of the developed world in regulating around the fuel efficiency of our domestic light fleet.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Dave Cull', with a stylized, cursive script.

Dave Cull  
**Mayor of Dunedin**