

From: [REDACTED]
To: [Clean Cars](#)
Subject: Clean Car Consultation Survey
Date: Monday, 15 July 2019 5:03:40 PM

Thank you for starting the process. It is long overdue. I would like to propose some tweaks to your plans:

1. Giving rebates for “cleaner” diesel and petrol cars sends the wrong signal. Tax the high polluters and let the cleaner cars avoid tax. They are still polluting. Use the extra to give larger discounts for electric cars as the withdrawal of the RUC exemption will cost more than the discounts proposed to a significant percentage of drivers.
2. **“There are a significant number of people who import three or less vehicles and so are not required to be registered as motor vehicle traders. The Government does not intend to apply the Clean Car Standard to their vehicles.”** This exemption will be abused.
3. A discount of \$8,000 for cars costing \$79,999 and \$0 for those costing \$80,0001 is among the worst forms of market distortion. Make the rebate a maximum at say \$60,000 and a flat rate from there. It is important to change the mindset of drivers who buy expensive cars as they are usually the most polluting and there is a risk that they will not care about an extra \$3000 of tax.
4. Bring the scheme in as quickly as possible. You have spent a lot of time bending over backwards to get agreement from all parties and it seems that one particular party is going to give you a hard time whatever you do. It would be a shame if the 2021 deadline encouraged a lot of people to delay purchase of EVs/accelerate purchases of polluting ICE cars.
5. I know that this is New Zealand’s first attempt at emissions standards, but can you pay some attention to pollutants other than CO2? There may be some lingering uncertainty over the accuracy of emissions tests, but it is clear that NOx and particulates are very damaging in their own ways. I am concerned that diesel is getting a relatively easy ride in your plan as it tends to produce less CO2 but higher levels of other pollutants.
6. Please come up with a more equitable RUC for PHEVs. It is quite feasible to drive them using petrol for less than 10% of journeys. Otherwise apply RUCs to all cars and be done with it.

Thanks for your attention and good luck

Marc Simmonds

[REDACTED]
[REDACTED]