

From: [REDACTED]
To: [Clean Cars](#)
Subject: Feedback on cleancars proposal
Date: Wednesday, 10 July 2019 5:28:32 PM

The proposed scheme is poorly considered.

In theory - a great idea - penalise high-emissions vehicles / subsidise low emissions vehicles.

However,

The scheme needs to target ongoing costs and fails to address the disparity between electric cars and Plug in Hybrid electric vehicles.

What is the problem? Under your new scheme the RUC exemption for electric vehicles will end, and owners of fully-electric (alternative fuel) vehicles will be paying the same RUCs as high emissions vehicles.

Plug in Hybrid vehicles (PHEV) which are capable of moving under fully-electric power alone are not (I believe) considered alternative fueled vehicles, and are not required to pay RUCs. This is a huge flaw which needs to be addressed. PHEVs claim ultra-low vehicle emissions and will achieve big discounts under the proposed scheme while not paying RUCs. e.g, The Toyota Prius Hybrid claims a fuel consumption of 1 litre / 100km. So travel 100km in a Prius and you might have spent \$2.20 on fuel, only a small proportion of which actually goes to the government. In actual fact - you may make small trips without using any petrol at all - so the government should consider that PHEVs offer zero revenue!

On the other hand, fully Electric vehicles (EVs) with zero emissions will be paying RUCs for every kilometre travelled. If I travel 100km in my Nissan Leaf - I will have spent \$7.20 on RUCs.

Is this a scheme that NZ really wants? The long-term emissions target should be ZERO, not 100grams per kilometre - and the scheme should not penalise fully electric vehicles in the manner illustrated above.

Any scheme that targets high-consumption vehicles to subsidise low emission vehicles should target ongoing costs. If someone buys an EV based on an attractive purchase price and it spends the majority of its time parked in a garage then it really hasn't done anything for the environment. The scheme needs to target ongoing costs in the form of RUCs and annual registration costs.

High consumption vehicles should pay higher annual costs and higher road user charges. High consumption alternative fuel (diesel) vehicles should be subsidising EV RUCs. The only way to address the disparity between PHEVs and EVs is to hold EV RUCs at zero rate. If this isn't sustainable then any car capable of moving solely under electrical power (i.e. PHEVs and EVs) need to pay RUCs.

YOU WILL KILL THE EV MARKET UNDER THIS NEW SCHEME - OWNING AN EV JUST WILL NOT STACK UP AGAINST A PHEV! This is the opposite of what you want to do!!!!

I would also like to point out that I purchased a 2nd hand EV in December. Under your proposed scheme I will lose several thousand dollars on the purchase price of my vehicle

because a newly imported vehicle will qualify for the maximum discount. On top of that, I have to start paying RUCs, so this new scheme REALLY SCREWS ME OVER! as an early adopter of fully electric transport. Given the objective of a cleaner environment - the new scheme should provide me with a rebate equivalent to the discount if I were buying my vehicle under the new scheme - or alternatively - provide a long term exemption to RUCs for EVs first registered prior to the new scheme.

Back to the drawing board I say! - the future of transport in NZ should be zero tax other than GST in the price of fuel - and every car paying a fair proportion of the cost of the roads based on usage.

Please reconsider!

Regards