

# Land Transport Rule: Vehicle Exhaust Emissions 2007

## Rule 33001/2

### Summary and analysis of submissions on yellow draft

July 2007

#### Contents

Background .....	2
Release of yellow draft .....	2
Submissions received .....	2
Methods of analysis.....	2
Analysis of issues raised in the submissions.....	3
Issue 1: Economic considerations.....	3
Issue 2: Regulatory impact .....	5
Issue 3: Emissions standards.....	5
Issue 4: Technical information.....	8
Issue 5: Rule drafting.....	9
Issue 6: Suggestions.....	10
Appendix 1: List of submitters.....	12

# Background

## ***Release of yellow draft***

The 'yellow' draft of *Land Transport Rule: Vehicle Exhaust Emissions 2007* (Rule 33001/2) was released for public consultation at the end of May 2007 with a deadline for submissions of 9 July 2007. This formal consultation followed extensive informal consultation about the proposed rule revision. The Ministry of Transport had met with many stakeholders in a wide range of forums since mid 2005 to discuss and to develop the proposals.

The measures proposed in this draft Rule, which would replace *Land Transport Rule: Vehicle Exhaust Emissions 2006* (the 2006 Rule), form part of the Government's initiatives for improving air quality by reducing vehicle emissions that contribute to air pollution.

The proposed revised Rule would update the existing minimum standards for new vehicles entering the New Zealand fleet. The draft Rule also proposed the introduction of minimum emissions standards for used vehicles imported into New Zealand and a requirement to test the emissions of those vehicles.

It also proposed two relatively minor changes to clarify that vehicles must be fitted with the technology known as on-board diagnostics where this is required by the standard, and to allow an exception for the New Zealand Defence Force from compliance with certain elements of the standards.

Comments were also sought on proposed requirements prohibiting the removal of, or tampering with, emissions control equipment fitted in a vehicle.

## ***Submissions received***

There were 84 submissions from a range of people, including some from overseas. There were submissions from private individuals; people in the motor trade and industry, including vehicle inspectors, dealers in new and used imports and consultants; associations and groups representing the motor industry; motoring groups and enthusiasts; local and central government; and environmental groups. *Appendix 1* is a list of submitters.

This summary and analysis has been prepared from the submissions received by the deadline 9 July 2007, with some late submissions till 16 July 2007. It does not include any 'supplementary submissions' on economic issues that might still be received after specific industry associations have considered the NZIER report they have commissioned.

## ***Methods of analysis***

The policy for this draft Rule has been developed by the Ministry of Transport and summarized and analysed by Land Transport New Zealand. Our organizations thank those who made submissions for taking the time and trouble to provide their comments and suggestions.

Land Transport NZ has provided the Ministry with detailed analyses of the key issues as well as the responses to the 23 Questions asked in the overview to the draft rule.

These detailed analyses have been condensed here to highlight the key issues, make recommendations to the Ministry from Land Transport NZ, and to provide those who made a submission with some feedback on the results of the consultation exercise.

The next steps will be to re-draft the rule and refer it to government for final consideration, and to the Minister of Transport for consideration and signature.

The proposed date for implementation of the Rule is 1 January 2008.

# **Analysis of issues raised in the submissions**

## ***Issue 1: Economic considerations***

Economic issues were the most important single concern in the submissions.

Those who tended to support the rule unconditionally were in favour of it because they were concerned about improving New Zealand's air quality by reducing vehicle emissions. This would be the benefit from the rule to NZ society.

By contrast there were many submissions, both from individuals in the motor trade and their organizations, which supported the rule in principle but did not agree with the timeframe in which it would be implemented. The main effect of the rule would be to set 'benchmark' or 'minimum' emissions standards to which a vehicle must have been manufactured if it was to be allowed to enter the NZ fleet. The volume of available compliant used vehicles depends on which standards are set as the minimum and when the minimum standards are set in place. Submissions contended that the rule as drafted would severely restrict the volume of available used vehicles that would meet the standard, which might cause disruptions in the industry sector that imports used vehicles, and might affect car prices.

Information about both benefits and costs are summarized below.

### **1.1 Benefits to society**

Benefits of the proposal (to NZ society) would occur if the tightening of emissions standards (for both new and used vehicle imports) resulted in reduced vehicle exhaust emissions and improved air quality which would reduce health risk.

Twenty six submissions supported the rule because it would improve NZ's air quality. Some of these were regional councils, local and central government and public health organizations that have to meet targets for air quality improvement.

Seven submissions gave the opinion that standards, preferably for all fuel types, must be introduced as soon as possible to hurry health and environmental benefits and a further six supported the aim of reducing harmful emissions to improve air quality and to improve NZ's emissions footprint.

Submitters said that NZ must have emissions regulation, equally for new and used cars, that all vehicles must meet latest emissions standards to protect the environment, that government must put clean-air policies in place eg through regulating emissions equally for new and used cars, that progressive restriction on used imports will improve the emissions of the fleet, and that a rise in vehicle costs should not be a valid concern against improving emissions standards for road users such as cyclists.

#### **Comments**

The submissions show there is clear support for improving NZ's air quality.

#### **Recommendations**

Support for clean air initiatives should continue to be taken into account when re-considering the pros and cons of this rule.

### **1.2 One type of costs to society**

Costs of the proposal (to NZ society) could arise if the effect of the legislation was to reduce the available volume of compliant cars, trucks, buses, particularly used imports, and if this caused a rise in costs of cars, buses and commercial vehicles. If people held on to older cars

longer the rule would not reduce emissions in the short term. If costs of buses increased this would affect initiatives for public transport and costs of school transport. If trucks cost more then extra transport costs would be passed on to consumers.

Several comprehensive submissions, notably those of the IMVDA and the MTA, who had been running workshops on the proposed rule throughout NZ during the consultation period, said that the rule as currently drafted would cause negative social effects to occur and emissions would not reduce. Import figures of vehicles meeting various emissions standards and the effect of restricting entry of some of these were presented to show that volumes of imports would reduce more than the amount estimated in the draft rule. This could put up prices of cars and might have 'perverse' effects affecting particularly poorer people and causing the fleet to degenerate.

There were also concerns about impacts on heavy vehicles and bus transport and the social costs of not being able to buy used school buses – a restriction on used bus import will hurt many people and not reduce pollution; unless the Ministry of Education has funds, school transport will face a crisis.

There were also concerns about wider implications on the economy of restricting the import of used heavy vehicles.

Submissions said that the Covec report was flawed in assumptions about phasing-in and implementation dates of standards in Japan and that it did not truly reflect the social effect of rule as drafted. It was stated that the MoT estimates of the volume reductions needed re-examination and that the analysis did not include all costs, such as effects on interest rates, overheads, purchasing costs and goods service costs, costs of equipment for testing.

Several submitters gave notice of their intention to send a supplementary submission once they had seen a revised Covec report and the NZIER report they had commissioned

#### **Comments**

There was sufficient detail in the submissions about the economic arguments that the Covec report will be revised to take the new information into account.

#### **Recommendations**

Any new information that arises from a revised Covec report and the NZIER report should be taken into consideration in re-drafting the rule.

### **1.3 Another type of costs to society**

Costs of the proposal (to NZ society) could arise from a decrease in the volume of imported used vehicles and consequent effects on industries and infrastructure that has grown up around this activity in the past 15 years, with consequent job losses and social burden. This effect would be particularly marked if the 'second stage' (Japan 05, Euro 4) proposals [and third stage Japan 09, Euro 5] were implemented on the timetable proposed in the rule.

Submissions by IMVDA and MTA representing a wide range of businesses said that the effect of the rule as drafted would be considerable as it would have unintended adverse consequences. The proposed rule included standards and timeframes that were too tight for industry to manage without significant negative effects and the rule would reverse all the benefits of the vibrant used import industry. In particular these adverse effects would occur if the proposed timing of introduction of the later Japanese standards 05 and 09 were prescribed as in the draft rule.

MTA presented an analysis of the effect on the vehicle fleet of various options including the status quo, as well as factors to be taken into account when developing this policy. IMVDA also analysed the effects of various emissions standards scenarios on the fleet dynamics and on the

available import volumes. They suggested that the MoT carefully consider these options and that a more gradual implementation be set in place. They also suggested that only one stage of the rule be set in place at first and that the effects be monitored and reviewed before the next phase.

#### **Comments**

The submissions from these key industry groups, representing a wide range of stakeholders, challenge some of the assumptions made in the MoT's economic analyses especially the timeframe that is proposed in the rule.

#### **Recommendations**

The information provided by the industry particularly as regards import volumes should be taken into consideration in re-drafting the rule.

### **1.4 General comment: Would the benefits exceed the costs?**

There were a range of opinions about whether the benefits of the rule as drafted would exceed the costs. The overall tone of these comments is negative.

### ***Issue 2: Regulatory impact***

In considering the regulatory impact of the proposed rule, it is essential to know what businesses would be affected and if possible to what extent. This information is related to the information required for considering social costs but is different because it is the cost to specific parties rather than the cost to society as a whole.

The majority of submissions on this issue provided information on the cost to the imported vehicle industry, and the infrastructure around it, if the volume of used imports reduced significantly as a result of the rule proposals. This includes dealers, truck importers, car carriers, entry certification businesses and associated industry.

There were also submissions on the cost to the automotive industry as a whole. This includes automotive repair businesses, operators of heavy vehicles particularly buses and rental vehicles, diesel bus importers and the motor home conversion industry. There were also comments on the effect on bus users and the school bus industry if its vehicles had to upgrade, and on the heavy vehicles fleet - 'the backbone of our economy.'

There were also a few submissions that suggested there would be impacts on NZ as a whole if a de facto trade barrier affected trade agreements or if the reduction in volume affected the balance of trade

#### **Comments**

Submitters are thanked for their comprehensive information about the breadth and depth of the industry and infrastructure that have grown up around the importing of used vehicles, both light and heavy vehicles, over the past fifteen years.

#### **Recommendations**

It is recommended that the information provided by the identified submitters is taken into account when considering the regulatory impact for the rule.

### ***Issue 3: Emissions standards***

This rule is one of the Land Transport Rules that are standards-based, and has much in common with the rules for safety standards. Each rule sets out acceptable standards for that system, part or component, incorporating by reference the equivalent standards from the four main jurisdictions from which we source our vehicles: Japan, Europe, Australia and the USA.

The effect of the Land Transport Rules for vehicle safety standards is to control the quality of the vehicles entering New Zealand by making sure they were manufactured to approved standards. They are also checked at entry to New Zealand to make sure they are in safe tolerance of the state when manufactured.

The Exhaust Emissions Rule will use many of the same principles as are in place for safety standards, but in its revised form will be more specific as to which VERSION of a standard must be met in order for a vehicle to be permitted to enter the NZ fleet.

Standards need to be prescribed in the rule for both new and used imports, and for both light and heavy vehicles (a heavy vehicle is one with Gross Vehicle Mass GVM over 3.5 tonne).

There are two kinds of information that are required in drafting the rule:

- Information about the standards themselves, for both new and used vehicles in various jurisdictions;
- Information about the phase-in provisions in other jurisdictions, which will determine what realistic lead-times for implementation of the various standards, can be prescribed in the rule.

### 3.1 Information on standards

A great deal of information about standards and their implementation/phase-in dates in the source country has been provided including information about:

- implementation of Japan standards for heavy diesel
- implementation dates from JAMA
- how the new-bus industry is taking initiatives to meet Euro emissions standards
- comparative Australian, Japan and Euro 5 standards
- 'GF' vehicles and the emissions standards to which they were manufactured

#### Comment

The standards information is being analyzed by staff in Vehicles section at Land Transport NZ. Submitters are thanked for the careful preparation of this material.

#### Recommendation

It is recommended that the information about emissions standards provided in submissions should be taken into account in re-drafting the rule.

### 3.2 Lead time for new imports

The issue regarding new vehicle imports is that NZ's 'smorgasbord' policy accepts vehicles from the four main jurisdictions, and that (despite great advances towards global harmonization) some of these countries introduce essentially equivalent standards at different times, and with different phase-in periods. (The phase-in period is the time from the **start date** when a new emissions standard is introduced, for new models to comply with, and the **mandatory** compliance date for all models).

For example, one of the questions asked in the overview concerned the Australian ADR 79/02 which is essentially the same as Euro 4 (introduced in Europe from 2005) but will not be mandatory in Australia for light petrol vehicles till mid-2010. How should NZ accommodate this?

Many suggestions were made in response to this question. Comments also made were:

- ADR 79/02 cannot be mandatory in NZ in Jan 2010 as it is not mandatory in Australia then

- because of phase-in dates overseas, the rule can only become mandatory after it is mandatory in the source country ie for all models not just new, and preferably two years after that
- it should be 2 yrs after mandatory in Europe and Japan because of Australian delays and the need to bed down new technology
- it is critically important from Australian manufacturer point of view that introduction dates in NZ not ahead of those in source country
- for new vehicles should be two years after mandatory overseas
- standard should be introduced after phase-in period for existing models has occurred
- two year lag for new vehicles but the Australian standards sometimes require three
- vitally important NZ and Australia match, suggest 79/02 from 1 July 2010
- rule proposes that Euro 5 mandatory in NZ on same date as in Europe, which is not practical
- RHD vehicles sourced outside Australasia often share same specs so requirements should match

### Comments

Submitters are thanked for their well-informed responses which include some new information about the way that standards are implemented in practice in overseas jurisdictions.

### Recommendations

It is recommended that information about standards supplied in submissions be taken into account when re-drafting the lead-times and implementation dates in the rule, to ensure that it can realistically be implemented for new vehicle imports.

## 3.3 Lead-time for used imports

The issue regarding used vehicle imports, particularly those from Japan, is also related to the phase-in period for the emission standard in that country. (The phase-in period is the time from the **start date** when a new emissions standard is introduced (for new models to comply with) and the **mandatory** compliance date for all models).

The draft rule proposed that 'Japan 00/02' should be the minimum standard required for entry to the NZ fleet after 1 January 2008. However, various submissions have analysed the vehicle standards to which vehicles were manufactured in Japan around that period, and contend that the phase-out of older standards (such as that indicated by the code GF) extended into the early 2000s so that there is a smaller volume of available compliant vehicles than was anticipated when the rule was developed.

There are three issues:

- (1) First stage: How and when should the Japan 00/02 standard be introduced?
- (2) Second stage: How and when should the Japan 05 standard be introduced?
- (3) Third stage: How and when should the Japan 09 standard be introduced?

Comments about the suggested lead-times for standards for used vehicles were supplied as responses to the questions in the overview, and also in a broader context as part of proposed alternative options to the rule as drafted. Extensive technical data were also provided including tables of suggested dates for implementation of the standards for used vehicles, suggested implementation dates and lead times, and tables detailing how the 'GF-coded' vehicles be phased out. It was noted that enforcement dates for Japan 09 are not yet finalised, so can't be included in the rule yet.

There were also suggestions that the rule should not cover all three stages at present. The first stage should be introduced first (the 00/02 standard from Japan) and then there should be a review of its effect before further stages (Japan 05 or 09) should be included in the rule.

## **Comments**

Submitters are thanked for their well-informed responses which include some new information about the way that standards are implemented in practice in overseas jurisdictions.

## **Recommendations**

It is recommended that information about standards supplied in submissions be taken into account when re-drafting the lead-times and implementation dates in the rule, to ensure that it can realistically be implemented for used vehicle imports.

It is recommended that the Ministry consider whether the rule should cover all three proposed stages at present. One way of achieving this would be for the rule to contain dates for all three stages, knowing that processes exist whereby they might be amended later if necessary, for example by an amendment to the rule. Another way would be to draft the rule with only the first stage and to require a review process to be carried out at a specified time in order to consider how to proceed to the next stage.

## **3.4 Lead time for heavy vehicles**

For heavy vehicles there are different problems in that new heavy vehicle imports are planned to meet NZ Rule requirements (such as those regarding dimensions and mass) as well as needing to suit our roads. In addition there are issues with having new technology (such as urea) available for vehicles to operate on if they meet the latest standards.

As regards used imports, the availability of relatively inexpensive used imports is an important part of the viability of the transport and passenger transport industry.

## **Recommendations**

It is recommended that the Ministry consider whether the rule should make special provisions for heavy vehicles when re-drafting the rule. For example, a three-year lead time might be provided for them and a two-year lead time for light vehicles, taking into account the industry's information about the need for advance model planning to suit NZ requirements.

## **3.5 Other comments about lead times, and reasons why lead time is needed.**

Other comments and opinions about lead times included the following points:

- must phase in new requirements in same way as it is done globally
- phase-in dates should not be out of synchronisation with phasing in country of origin
- need to include in rule a timeframe for implementation eg specify dates for equipment purchase and training
- lead time is required because of shipping, etc, should be two years
- reasons from JAMA why a short lead time eg 6 months won't work.

## **Recommendations**

It is recommended that the Ministry note the comments made by submitters about the need for lead times.

## ***Issue 4: Technical information***

As many of the submissions were from people with mechanical expertise there were extensive and useful comments on technical issues. These include comments on the nature of modern



exhaust systems and new technology and fuels; discussions about modification, repair and 'tampering', and emissions tests and testing equipment. This information was often supplied in answer to several of the 23 Questions asked in the overview.

### **Comments**

Submitters are thanked for the detailed information they have provided

## ***Issue 5: Rule drafting***

### **5.1 Rule wording**

Comments were made as to wording of the draft Rule:

- Request to clarify 2.1(2): this is intended to cover phase-in anomalies but the submissions said it was not clear
- Low-volume vehicle issues (LVV)
- Submissions requested that some definitions be clarified
- Suggested wording changes as identified in submissions

### **Recommendation**

Comments and suggestions regarding rule drafting should be taken into account when the rule is re-drafted.

### **5.2 Suggested rule content changes**

There were several suggestions that the rule content be re-drafted, including:

- Suggested changes to TECHNICAL requirements in rule - mainly the specification of dates when rule comes into force - (cannot be made till policy changes analysed and recommendations made). In particular cannot change implementation dates at present for either new or used vehicles, and cannot drop later stages of rule (Japan 05 and 09 )'subject to review' as requested by industry
- Suggested change in approach to heavy vehicles (as above cannot do this till policy decisions made).
- Include staged implementation for various parts of rule, ie staged implementation dates (cannot do till policy decisions made) eg rule could indeed come into force 1 Jan 08 but different parts at various dates thereafter)

### **5.3: Exemptions**

Comments and suggestions as to which vehicles should be exempted were included in the responses to the 23 Questions asked in the overview and some additional comment was made.

- agrees enthusiasts cars exempt
- appreciate exemption of collectibles
- LHD enthusiasts approve proposed exempted categories
- opinion - agree immigrants vehicles exempted etc
- request for exemptions for vehicles to be used in motorhome conversions
- some specialist imports might need exempting
- suggest exemptions to replace stolen or damaged noncompliant vehicle
- 'people movers' exempt from the Frontal Impact rule should also be exempt emissions as they are such useful vehicles for families

## **Issue 6: Suggestions**

Suggestions were made by submitters on a wide range of topics, many of them outside the framework of the 23 Questions asked in the overview. Some of the main points are given here.

The suggestions made will be taken into account when the rule is re-drafted.

### **6.1 Suggestions about used imports**

The following suggestions were made :

- supports IMVDA proposal for GF stds and review points [Y56]
- introduce GF standard and gradually proceed, with a review [Y74]
- abandon rule and replace with integrated strategy [ Y54]
- agree with IMVDA suggestion for integrated strategy [Y82]
- Analysis by MTA of alternative approaches to rule as drafted, and recommendations [Y73]
- abandon rule, perhaps a 8yr rolling age ban [Y53]
- comprehensive review shd be required before next stage of stds [Y54]
- defer Japan 00/02 to Jan 09 and then eight yrs lag for later stds implementation, [Y64]
- MTA have developed a package of suggestions [Y73]
- MTA method 1: Age profile analysis, MTA Method 2 top 100 models [Y73]
- MTA suggestions, to defer rule a year based on GF, introduce 8 yr lag for new step changes [Y73]
- more gradual, from 1998 for now [Y11]
- rule should be reviewed before second phase of restrictions [Y62]
- suggested implementation dates for used imports [Y64 ]

### **6.2 Suggestions about new imports**

The following suggestions were made :

- agree with MIA that two year lag from mandatory overseas wd eliminate need for new-existing model separation in rule, [Y65]
- commencement dates for new vehs two years after mandatory for all vehs in source country, [Y55]
- NZ market too small to introduce std before reqd in Australia, [Y51]
- start dates two years post MANDATORY date in source country not NEW vehicle date, [Y40]
- suggest five-year lag for Euro 5 stds ie 2014, [Y66]

to get the latest models NZ must mirror conditions overseas, [Y55]

### **6.3 Suggestions for heavy vehicles**

- because buses are remanufactured the date of mfr not the same as that of the engine, Y78
- don't set stds for heavy vehicles but test and upgrade them, Y54
- emissions restrictions to older buses accepted if RUC relief, mass and dimension rule changes, and extra funding from MoE, Y78
- existing models must have 12 months lag esp for heavy vehicles, Y51
- might deal with light vehicles first then those over 3.5t, Y78
- suggest instead a 10-yr limit on importation of used buses, Y61

test heavy dsIs and upgrade them to Euro 3, Y44

### **6.4 Other suggestions**

Scrappage:

- allow small 97-99 cars in, Y18
- end-of-life ELV scrappage for gross emitters, Y10

- encourage scrappage of older vehs, Y82

#### Implementation timetables

- order of events for implementation, Y31
- request LTNZ to research all the stds and create a table before rule signed, Y51

#### Emissions testing

- in-service test must follow, Y18
- model the tests on Euro standards and procedures, Y48
- perhaps special emissions testing authority in addition to WoF, Y46
- use more advanced test when available, Y07
- tougher enforcement of Wof etc, Y02

## Appendix 1: List of submitters

Y1	Mr	Richard	Peebles	
Y2	Mr	Andrew	Wellum	
Y3	Mr	David	Bridle	
Y4	Prof	John	McCall	
Y5	Mr	George	Maddever	
Y6	Mr	Brian	Jackson	
Y7	Mr	Andrew	Campbell	Fuel Technology Limited
Y8	Mr	Richard	Rozendaal	
Y9	Mr	D G	Hall	Hallmark Wholesale Cars
Y10	Mr	Gordon	Shaw	Sempre Avanti Consulting
Y11	Mr	Richard	Howell	Richard Howell Motors Ltd
Y12	Mr	Peter	Collins	GNS Science
Y13	Mr		Mansell	Gisborne Environment Centre
Y14	Mr	Doug	Murdoch	R V Kiwi Ltd Motorhomes
Y15	Ms	Nicola	Shorten	Greater Wellington Regional Council
Y16	Mr	Graeme	Farr	
Y17	Mr	John	Railton	Clean Air Auckland
Y18	Mr	Arthur	Murray	Hatchback Autos Ltd.
Y19	Mr	Hamish	Hamilton	
Y20	Mr	Neil	Stott	
Y21	Mr	Jeff	Tobin	Left-Hand Drive Enthusiasts Federation
Y22	Mr	Andrew	McClintock	Federation of Motoring Clubs
Y23		Marta	Fisch	
Y24	Mr	Albert	Hutterd	BA Vehicle Imports Ltd
Y25	Mr	Mike	Hurley	Bosch Service Dealers Network
Y26	Mr	Ken	Mcadam	
Y27		Dianne	Glen	Auckland Regional Council Environment Committee
Y28	Mr	Derek	Wigzell	NZ Equipment Suppliers Association
Y29	Mr	Philip	Eustace	Hyundai New Zealand
Y30	Mr	Sandy	Mills	Waitakere City Council
Y31	Mr	Brian	Sara	Vehicle Testing NZ
Y32	Mr	Chris	Drake	Vehicle Inspection NZ
Y33	Mr	Andrew	Shand	Public Health South
Y34	Mr	Tony	Johnson	Low Volume Vehicle Technical Association
Y35		Catherine	Beard	Greenhouse Policy Coalition
Y36	Mr	Mark	Rounthwaite	Toyota New Zealand
Y37	Mr	Russell	McKnight	McStripes and Signs Ltd
Y38	Mr	Michael	Smith	
Y39	Mr	Keith	Seyer	Federal Chamber of Automotive Industries
Y40	Mr	Peter	Keley	Holden New Zealand
Y41	Mr	Garry	Law	Environmental Defence Society
Y42	Mr	Evan	Philpot	JEVIC NZ Ltd
Y43	Mr	Glenn	Mortimer	Northland Regional Council
Y44	Mr	D A	Weir	Vehicle Testing and Compliance 2007
Y45	Mrs	Lyn	McKie	BRONZ Otago
Y46		Kirsten	Bojsen-Moller	Clean Air Auckland
Y47		Ralph		
Y48	Mssrs	Herbert Kevin	Leijen/Hamer	Emission Testing NZ
Y49	Mr	Ben	Adams	Cycle Action Auckland
Y50	Mr	Lloyd	Eade	

Y51	Mr	Lloyd	Robinson	Mitsubishi Motors NZ Ltd
Y52	Mr	Terry	Riches	Kiwi Car Carriers
Y53	Mr	Neville	Boyd	Vehicle Service Federation Inc.
Y54	Mr	David	Vinsen	Imported Motor Vehicle Dealers Association
Y55	Mr	Perry	Kerr	Motor Industry Association
Y56	Mr	Nick	Owens	Autoinspection Services Ltd
Y57	Mr	Harry	Wilson	Environment Waikato
Y58	Mr	Eugene	Bowen	Local Government New Zealand
Y59	Mr	M W	Butler	Environment Bay of Plenty
Y60	Mr	Glynn	Tulloch	European Motor Distributors Ltd
Y61	Mr	Paul	Lethbridge	Paul Lethbridge Motors
Y62	Mr	Michael	Smith	Vehicle Compliance Association
Y63	Mr	John	Bortolussi	Cummins South Pacific
Y64	Mr	Mike	Noon	Automobile Association
Y65	Mr	Dean	Hoverd	Isuzu New Zealand Ltd
Y66	Mr	Hamish	Wilson	Consumers Institute
Y67	Mr	Mark	Roberts	Sustainable Business Network
Y68		Saiich	Motomiya	JAMA
Y69	Mr	Matthew	Chalmers	
Y70	Mr	Sam	Barns	Barnco Industries Ltd
Y71	Mr	John	Hoare	Association for Independent Research
Y72	Mr	Peter	Vahry	NZ Four Wheel Drive Association
Y73	Mr	Nick	Hill	Motor Trade Association
Y74	Mr	Martin	Harcourt	Hornby Cars Ltd
Y75	Mr	Hayden	Spatcher	Waltham Mechanical 2004
Y76		J C	Horne	
Y77	Mr	Graeme	Gibbons	The Colonial Motor Company Ltd
Y78	Mr	Paul	Asquith	Bus and Coach Association
Y79	Mr	Lindsay	Gow	Ministry for the Environment
Y80	Mr	Kerry	Arnold	Road Transport Forum
Y81	Mr	Richard	Matheson	Ford Motor Company of NZ
Y82	Mr	Graham	Roberts	Turners Auctions Ltd
Y83	Mr	Russell	Scoular	Ford Australia
Y84	Mr	Peter	Duncan	VINZ