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P.14	Is the Clean Car Standard appropriate for New Zealand? If not, why?	No, it is not appropriate for New Zealand. We agree that some standard needs to be applied from the viewpoint of protection of environment and its sustainability. However, if the government really wants to introduce the Clean Car Standard into NZ, the achievement of its target will not be possible without drastically reducing used vehicle import. In NZ the market size of used vehicles is almost the same as that of new vehicles. If the Clean Car Standard is introduced into such a market, we are afraid that the new vehicle business would not be sustainable because the new vehicle prices would have to increase a lot due to the cost of technology for higher fuel efficiency. If the distributors of New vehicles go out of business, after-sales maintenances of vehicles cannot continue anymore. Consequently, sales of used vehicles of poor quality would increment, which would cause harmful influences to the environment due to their higher emission of CO2 and other harmful substances.
	Is an average emissions target of 105 grams CO2 per kilometre by 2025 an appropriate target for New Zealand? If not, why?	We don't think it is appropriate. Firstly, we think that the emission target should be different between passengers and commercials. We request to lower the proposed emissions national weighted average target to 130g/km by 2025. We think that the target of 105g/km by 2025 is too strict. Suzuki would have to accomplish approximately 85g/km by 2025 based on the average weight of 1,000kg. If we compare it with Suzuki's target of 87.5g/km by EU standard under WLTP, NZ would require an even more rigorous target than Europe, which is not viable. (Actually it would be the most rigorous standard on earth.)
	What effect do you think the Clean Car Standard would have on vehicle supply and prices?	We are afraid that people would not be encouraged to buy vehicles due to high costs/prices of Hybrid & EV. So, we think some scheme to promote the purchase of such vehicles would be necessary. We agree with the idea of a feebate system as it can lead to more low emission vehicles and thus to better environment. But it will be necessary to re-consider the details of conditions, such as unit amount to be applied. In order to introduce Clean Car, considerable time for Car development, infrastructure of battery recycling and cost reduction will be necessary. Therefore, it will be very difficult for us to introduce Clean Car products by 2025. In case Clean Car Standard were introduced in 2025, supply of conventional Gasoline Cars would have to be restricted, which would make our business
P.16	Do you consider the overall process outlined for the Clean Car Standard is workable? If not, why?	We don't agree with idea of making distributors report the emission results to the government. If the CO2 and weight data of each model are in the government's system, and so are the vehicle registration data, CO2 emission result can be automatically calculated and the comparison against the target can also be done. We suggest that government should establish such a calculation program, so that each distributor does not have to submit a separate report.
	The Clean Car Standard will cover new vehicles and used vehicles being brought into New Zealand. Should people who import three vehicles or less be exempted?	It is difficult for us to judge since we have no information about the proportion that such people/vehicles occupy altogether in the total fleet, but we think it will be necessary to include them in the standard if their ratio is not negligible.
P.17	Do you support phasing-in the 105 grams CO2 per kilometre emissions target by: adopting multiple targets that progressively lower to 105 grams? OR using the increasing percentage of fleet approach? Please explain why you prefer the approach you have chosen.	We don't support either the multiple targets or the single target. We request the introduction of European system/regulation. In case of the multiple targets, we will be obliged to comply with the target every year, but considering necessary lead time for vehicle development, 2022 is too early. In case of the single target, The range of products sellable in NZ will be restricted and thus not commercially feasible for manufacturers/distributors.
	Do you support the timeframe for the phase in period? If not, why?	We don't support it because it is impossible to meet the target of 2022 due to insufficient leadtime for necessary development of vehicles. Even if the introduction of standard in 2022 were inevitable, the penalty should not be applied before 2025 in order for us to re-organize our product mix.
P.19	Do you support adopting a weight-adjusted Clean Car Standard? If not, why?	1) We don't support it because the criteria of weight-adjusted target setting are not clear. 2) We would like to request that the conditions of the standard be fair for all manufacturers. In case of setting up weight-adjusted targets, Such targets should be linearly proportional to vehicle weights as adopted in Europe. 3) We do not think that a model that has achieved the National Weighted average target should be obliged to comply with a more strict target. On the contrary, it should be rewarded with incentive.
P.20	Do you support a penalty of \$100 for each gram CO2 per kilometre that a supplier of new vehicles exceeds its fleet target? If not, why?	We don't think that any penalty should be applied before 2025 due to necessity of re-organizing the product mix. A realistic solution would be to start the penalty system after 2025, gradually increasing the penalty amount, but keeping it at a low level during the first several years. Regarding the penalty amount, it will be impossible to evaluate its validity UNTIL after a technical study is done based on the details of the Clean Car Standard.  On the other hand, there is no criteria/standard about safety in NZ. We request that such regulations/standard be established, too.
	Do you support a penalty of \$50 for each gram CO2 per kilometre that a supplier of used imported vehicles exceeds its fleet target? If not, why?	We don't support it. We consider that the penalty for used vehicles should be the same or more than new vehicles because the CO2 emission level of new vehicles is controlled in a very strict manner considering the production tolerance in assembly while such control is not done about used vehicles.  As previously mentioned, we consider that the achievement of targets stipulated in the Clean Car Standard will not be possible without drastically reducing used vehicle import. If NZ continues to allow it, we consider that the below conditions should be defined clearly, too. 1) CO2 measurement of every used vehicle in an accurate manner should be mandatory. 2) <del>No incentives in the feebate scheme should be applied to any used vehicles</del>
	Do you support the banking mechanism to provide flexibility for vehicle suppliers? If not, why?	We support it.
	Do you agree that the new vehicle sector should have the added flexibility of borrowing? If not, why?	We agree with it. We request for a rewarding mechanism, such as off-cycle credit and super credit as EU has in order to give flexibility to manufacturers/distributors.

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P.22	Do you support an arrangement for suppliers to pool their vehicles together to comply as a group? If not, why?	We support it.
	Do you agree that new and used vehicle suppliers should not be able to pool their vehicles and comply as a group? If not, why? If you think they should be able to comply as a group, how should the different lifetime emissions of new vehicles and used vehicles be measured and balanced?	We agree with it. Distributors sell New vehicles that ensure sufficient quality and appropriate warranty for customers who use them. On the other hand, maintenance history of used vehicles is not clear and thus evaluation of quality level including emission performance is very difficult. So we request that system/standard of CO2 emission measurement of used vehicles be established in the first place.
P.23	Do you support having the following penalties for misreporting data for the Clean Car Standard: for an individual, a fine not exceeding \$15,000 for a person or an organisation other than an individual, a fine not exceeding \$75,000? If not, why?	No, we don't. We believe that the Ministry of Transport has all necessary information to calculate CO2 results. They should inform each distributor of the results as well as the calculation details and ask distributors to confirm the correctness of calculation.
	Do you support the sanction of disqualification from being a registered motor vehicle dealer if a supplier deliberately attempts to evade meeting annual targets? If not, why?	<b>There should be a mechanism that prevents all suppliers from evading the obligation to meet targets</b> <b>We would support disqualification from being a used motor vehicle trader for deliberate offences.</b>
P.24	Do you support amending the Fuel Consumption Information Rule so that only vehicles tested to the WLTP, NEDC, the JC08, and the American Federal Test Procedure meet requirements for entry certification? If not, why?	We think that it is necessary to introduce a system/standard of the application or conversion of CO2 emission if NZ government keeps allowing the import of vehicles of specifications of either Japan, Europe, USA or Australia.  Emission results of a specific product vary depending on which driving mode among the four is used for CO2 measurement. So some coefficient will be indispensable to convert the results into WLTP-based figures in order to avoid unfairness due to vehicle specifications.  New vehicle manufacturers/distributors are required to input emission performance detail into the land transport system and if requested at any audit, produce the test data to support the information entered. On the other hand, although the same requirement exists for Used Import vehicles it is not possible that Used vehicle importers could produce manufacturers' test data if audited nor do they often have full service histories to know the detail of any emission parts that may have been changed. <del>Because of this, each one of used vehicles should be subject to an emissions test before being able to enter service.</del>
P.25	Do you agree with the proposed process of setting future emission targets? If not, what would you change and why?	<b>We basically agree with the idea of reviewing the emission targets every 5 years considering the market situation.</b> <b>However, we estimate that at least 7 or 8 years will be required between the decision for introduction of standard and the actual implementation because the setting of targets and rules will require an evaluation of multiple aspects, such as spread of low-CO2 car technology, the environment in NZ, market transition, future trend, etc.</b>
P.27	Is the Clean Car Discount appropriate for New Zealand? If not, why?	Yes, it can be because incentives for low emission vehicles can accelerate the fleet growth of such vehicles. However, it will be necessary to take time and study how incentives should be applied, i.g. criteria for taxation brackets, ranges and unit amount of feebate scheme, consideration of CO2 performance level rather than just for being EV/PHEV, etc..
P.29	Is the emissions benchmark of 105 grams CO2 per kilometre by 2025 an appropriate one to have for the Clean Car Discount? If not, why?	No we don't think so. First priority in the reconsideration of standard consists of the following. 1) We insist that the national weighted average target should be 130g/km in 2025. 2) We also insist that yearly declining curve of target be more gentle.
	Would an initial emissions benchmark of 150 grams CO2 per kilometre be suitable for the first year of the Clean Car Discount? If not, why?	No, we don't think so because the criteria of the benchmark are not clear. It should be reviewed together with the benchmark of 2025.
P.29	Would the level of the fees and discounts in the example feebate schedules (Appendix 4) increase demand for low-emission vehicles? If not what changes would you make?	We think that it will increase the demand to a certain extent. However, we cannot judge if the proposed unit amount will be appropriate or not.
	In the example schedules the schedules change every year to lower the emissions benchmark and to keep the scheme self-financing. Do you think annual change is practical or should there be less change?	We think that changes are too big. They would cause big change of sales volume and thus, hamper stable business continuation. As a result, there might be brands that withdraw from the market without continuing aftersales services.
	Should new vehicles include near-new vehicles less than 3 years old?	The maintenance history is often unknown about such used vehicles as well as their performance level. Therefore, we do not think that any incentive scheme should be applied to any used vehicles including those near-new vehicles less than 3 years old.
P.30	Do you think a zero band is appropriate? If not why?	Yes, we do. We do not foresee any particularly negative impact with this scheme.
	Do you think the size of the zero band in the example feebate schedules is appropriate? If not why?	It is difficult for us to judge if it is appropriate or not at the moment.
P.31	Do you support the proposal to apply the fees and discounts directly at the point of vehicle purchase? If not, why?	In order to reduce the increment of CO2 emission in the transportation sector, it will not be sufficient to regulate CO2 emission of vehicles (new and used) to be registered in the future only. It will also be necessary to establish a mechanism to encourage users of existing high emission vehicles to change for low emission vehicles. For this purpose, introduction of a scrap incentive campaign or an annual vehicle taxation based on CO2 level as introduced in EU should be considered.
	Do you support the penalties outlined in this section to ensure that fees and discounts are displayed on each vehicle and are correctly applied by vehicle suppliers? If not, why?	Yes. We support it.