

Cycling Advocates' Network of NZ

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Submission on Vehicle Exhaust Emissions rule

About Cycling Advocates Network

Cycling Advocates Network of New Zealand (CAN) is the country's advocacy group for people who use the bicycle as a means of transport - for commuting, shopping, getting to school or for recreation. CAN works with ministries and government departments and agencies to formulate policies for better biking facilities throughout the country.

CAN's aims are:

- To encourage cycle use
- To improve cycling conditions and safety for cyclists
- To improve the image of cycling

General comments

CAN welcomes the opportunity to comment on the vehicle exhaust emission rule change. We note with particular interest from the draft the section regarding "Application of Rule-making criteria" that gives the reasons for changing the emission rules.

CAN supports the objectives of this rule change.

Our observations in this submission are open and we welcome members of the public to view the contents.

CAN's observation of the emission rule change

Overview

a) Euro 4 standard for heavy diesel vehicles -

CAN recommends that the introduction date for existing-model vehicles be the same as that of the new-model vehicles. We believe that the sooner the change is made, the better.

The emission levels / standard being adopted only ensures that majority of the vehicles remain as they are now. Only a small percentage of vehicles will be put off the road. This is not enough. The standard should be to upgrade even newer models to lower emissions, something that is not difficult.

The emission standard itself should be upwardly revised at regular intervals, so that - 1) the standard keeps pace with technological evolution, 2) cars beyond a certain age and exceeding the emission standards are systematically removed 3) emissions are reduced over time, rather than just kept at current levels.

b) Visible smoke check.

We believe that visible checks are always prone to errors of judgement. What is bad for someone may be good enough for others. We recommend that LTNZ should reconsider the option of electronic monitoring facilities, even if there is a cost associated with the option.

Section 3 of the rule does identify the intention of identifying visible and dense smoke.

The rule is not clear whether vehicles manufactured before 1st of January 2004 will come under the amended rule. We would like the rule to be more specific on this category.

Other Comments about the draft rule

a) Health and safety - we agree with LTNZ's view that visibility reduction due to excessive emissions increases risk factors associated with driving. Lower visibility means more chance of cyclists not being seen on the roads and getting knocked down by cars. Excessive emissions also mean that people in general and cyclists in particular are directly exposed to the harmful effects of vehicle exhausts, leading to respiratory illnesses. Lower emissions will improve both health and safety of the communities.

b) CAN believes that the standards should be tougher for major metropolitan cities like Auckland, Hamilton, Palmerston North, Wellington and Christchurch, since existing exhaust emissions are already high in these regions.

c) We would like to highlight that New Zealand is obliged to reduce total emissions as per the Kyoto protocol. We do not see any particular reference to the protocol in the draft overview. Kyoto protocol will give further credence to the rule change.

d) CAN would like to highlight that cycling and walking are an effective medium of transport for reducing vehicle exhaust emissions, especially for short distances. Vehicle's emissions are highest in the initial stages of the journey. Making it attractive to use cycles instead of cars for such short distances, except in unavoidable circumstances, will further help reduce emissions.

e) We suggest LTNZ impose a cost for unnecessary usage of cars, by introducing congestion charges for bringing cars into the CBD areas in the weekdays and through emission surcharge on petrol.

Future consultation

CAN would like to have the opportunity to contribute further to the emission rule change and would welcome further consultation.

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