

Submission to:

Ministry for the Environment

on:

- Emissions Reduction Plan 2

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About VIA

The Imported Motor Vehicle Industry Association Incorporated (“VIA”) is the business association that represents the interests of the wider trade involved in importing, preparing, wholesaling, and retailing used vehicles imported from Japan, UK, and other jurisdictions.

Our members include importers, wholesalers, Japanese auction companies and exporters, shipping companies, inspection agencies, KSDPs¹, ports companies, compliance shops and service providers to the trade, as well as retailers.

We provide legal and technical advice to the trade, and liaise closely with the relevant government departments, including Waka Kotahi (NZTA), Ministry of Transport, New Zealand Customs Service, Ministry for Primary Industries (MPI), Ministry of Consumer Affairs, Commerce Commission, EECA, MfE etc.

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Official Information Act 1982:

VIA has no objection to the release of any part of this statement of support under the Official Information Act 1982.

Privacy Act 1993:

VIA has no objection to being identified as the submitter.

¹ KSDP - key service delivery partner, organisations that are contracted or appointed by the Transport Agency to deliver regulatory products or services and who have sufficient market share and/or are of sufficient size and standing within an industry segment to be able to represent and influence the customer expectation of that industry segment.

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Submission on the Second Emissions Reduction Plan Consultation Paper

Introduction

VIA represents the interests of the wider trade involved in the independent importing, preparing, wholesaling, and retailing of vehicles imported from Japan, the UK, and other jurisdictions. Our members include importers, wholesalers, Japanese auction companies, exporters, shipping companies, inspection agencies, ports companies, compliance shops, service providers to the trade, and retailers.

VIA remains committed to contributing positively to New Zealand's efforts to reduce carbon emissions and enhance sustainability across the transport sector. However, VIA advocates for a pragmatic, equitable, and realistic approach to achieving these goals, considering the perspectives gathered from various stakeholders and aligning with our foundational principles.

EV Charging Infrastructure

- **Balanced Development and Equity:** While VIA supports the expansion of EV charging infrastructure, we stress the importance of equitable distribution, ensuring that regions like the South Island receive adequate attention. Charging infrastructure should be universally accessible, including provisions for heavy vehicles and consideration of accessibility needs for all drivers.
- **Cost-Effective Implementation:** Through the consultation process, in the webinars held by the Ministry, comments from the public emphasized the need to avoid imposing excessive costs on households and businesses. VIA echoes this concern, advocating for policies that balance investment in infrastructure with the economic realities faced by New Zealanders.



Public Transport and Modal Shift:

- **Integration and Innovation:** VIA supports the Government's focus on improving public transport but highlights the importance of integrating these efforts with other low-emission transport modes, including walking, cycling, and rail. This holistic approach should be prioritized to reduce overall vehicle kilometres travelled (VKT), addressing both emissions and congestion.
- **Avoiding Over-Reliance on EVs:** The shift towards EVs should not overshadow the broader need for a multi-modal transport system. As noted in public feedback during the consultation, investments in public transport and active modes of travel should be increased to offer comprehensive solutions to transport emissions.

Road User Charges (RUC) and Vehicle Safety:

- **Equitable and Transparent RUC Adjustments:** VIA supports the introduction of RUC that reflect vehicle weight and usage, ensuring that those who use the roads more contribute fairly to their maintenance. However, these charges must be implemented transparently and equitably to avoid unintended economic burdens on specific segments of the population.

Decarbonization and Technological Neutrality:

- **Balanced Decarbonization:** VIA advocates for a balanced approach to decarbonization that includes technological neutrality, promoting the adoption of various low-emission technologies without prescribing specific solutions. This approach should allow the market to evolve naturally, driven by innovation and consumer choice.
- **Focus on Efficiency and Affordability:** As public feedback suggests, decarbonization efforts must be paired with policies that ensure the continued availability of affordable, efficient vehicles. VIA supports the introduction of efficiency improvements and technological substitutions that do not disproportionately impact lower-income households.

Engagement and Collaboration

- **Stakeholder Involvement:** VIA emphasizes the importance of continuous engagement with all stakeholders, including the public, government agencies, and industry players. Policies developed in isolation can lead to unintended consequences, whereas collaborative approaches are more likely to achieve sustainable outcomes.

Conclusion

- VIA is dedicated to supporting New Zealand's transition to a low-emission future. However, this transition must be managed carefully, ensuring that the measures adopted are equitable, practical, and effective in achieving the desired outcomes. VIA looks forward to further dialogue and collaboration to refine these policies and ensure they align with the interests of all stakeholders.
- Thank you for considering our submission.