

SUBMISSION ON

LAND TRANSPORT RULE 33001/2 VEHICLE EXHAUST EMISSIONS (2007)

ON BEHALF OF THE FEDERATION OF MOTORING CLUBS (FOMC)

The Federation of Motoring Clubs (FOMC) represents approximately 100 member clubs ranging from cars to motorcycles, commercial and military vehicles, traction engines, tractors and farm machinery, covering heritage and collectors vehicles spanning all years of production.

On behalf of our member clubs thank you for exempting unique and collectable vehicles.

When the Frontal Impact Rule 2001 was amended this year the first mention of unique collectable vehicles was made in the yellow draft on Rule 32006/3. The FOMC requested that it be represented on the proposed panel of recognised vehicle experts to define unique/collectable. This was done via our submission on Rule 32006/3. At the time of writing this submission we have heard nothing from you about this proposed panel nor have we had any indication as to what will constitute a unique/collectable vehicle. Without a clear description of unique/collectable it is impossible for us to decide on our member clubs behalf if other post 1990 vehicles should be exempt or if unique/collectable will cover them.

Although not all your questions would concern member clubs we will pass on our thoughts anyway.

Question 1- Which if any of the proposed exhaust emission standards for new vehicles should have their implementation changed?

Answer – See answers to questions 3 and 5.

Question 2 – Under what situations if any should the rule require existing model new vehicles to meet the same introductory date for a standard as new model new vehicles?

Answer – They should not be required to meet the same introductory date.

Question 3 – How many years should NZ lag the introductory date of any new emission standards following their introduction in Europe and Japan? Why is this lag required?

Answer – Time to allow any stock ordered or in stock to be sold. Your proposed 1 year may not be long enough, if say a tourist coach body is to be designed and fitted to a new chassis that may have already been delayed in its arrival.

Question 4 – What if any, fuel types other than petrol and diesel should the rule cover and why?

Answer – The rule should cover only petrol and diesel vehicles and dual fuel vehicles using petrol or diesel as one of the alternatives, these vehicles to be tested on petrol or diesel only as LPG and CNG are inherently clean burning. Over the years NZ scientists and inventors have come up with inventions that are world class, from splitting the atom to the electric fence. We must encourage the development and use of alternative fuels and hybrid vehicles, if exempting all but petrol and diesel will help so be it.

Question 5 – How should NZ incorporate in the rule ADR 79/02 (from Australia) but not implemented in Australia until 1 July 2008?

Answer – If it's not implemented in Australia until 2008 how can we incorporate it before this date and still import Australian cars?

Question 6 – Aside from defence vehicles what if any other types or classes of new vehicles currently covered by the rule should not be required to comply?

Answer – Tractors (all) and motorcycles. If tractors that are constructed principally for towing an agricultural trailer need an exemption, we presume there are post 1990 tractors of this type that won't meet the proposed emission standards, if this is the case it's logical to presume other post 1990 tractors may not meet the standard. For this reason we believe all tractors should be exempt, it would be detrimental to encourage farmers and contractors to retain old tractors simply because more economic fuel efficient machinery does not meet the proposed standard.

We suggest 1.3(1)(a) should be –

All agricultural and industrial tractors and road legal self propelled farm machinery and road maintenance machinery.

Also – As motorcycles are fuel efficient, reduce traffic and parking congestion and always carry a least half their intended load (whereas a car with only a driver is carrying a quarter or less of its capacity). If a quarter of daily commuters rode motorcycles congestion and pollution would be more than halved due to greatly reduced travelling time for all. The fitting of catalytic converters to small motorcycles is not practical or economic (at this point in time). The use of motorcycles should be encouraged.

We suggest 1.3(1)(c) should read –

Vehicles of class AB, LA, LB, LB1, LB2, LC or LD

Also vehicles of class MA, MB or MC that are not required by 2.7(d)(e) or (f) of Land Transport Rule: Frontal Impact 2001 to comply with a frontal impact standard.

Question 7 – Under what circumstances should on-board diagnostic equipment not be required to be fitted where this is required by the relevant standard?

Answer – See our answer to question 19. Also the Govt have agreed to the petroleum products specifications regulations, but governments don't always keep their agreements. Is quality fuel guaranteed? Volvo for example sent vehicles to NZ with what they called dirty engines, to match our poor quality fuel and Citroen would not sell their diesel models in this country because of our poor quality fuel. We know of a privately imported Citroen diesel that ground to a halt between Auckland and Taupo. The computer had flashed warnings on previous fuel stops to use better fuel but because the owner hadn't used clean fuel (he wasn't able to) the computer shut the car down. Importers of second hand Jap diesels try to sell them with Japanese fuel in the tank, once filled with our diesel they smoke and don't run as well (0.5ppm sulphur as opposed to 5.0 ppm NZ)

Question 9 – Are there any other new vehicles imported for use for a specialised purpose that do not have to comply?

Answer – Tractors – see answer to question 6.

Question 11- See answer to question 5.

Question 12 – If vehicles such as those manufactured before 1990 or immigrants, unique/collectable or motor sport vehicles do not have to meet the standard what standard should they have to meet?

Answer – The air fuel ratio recommended by the manufacturer if specifications available, remember no specifications were given for pre circa 1960 vehicles and our octane rating is now too high to burn properly in a low compression engine.

Question 13 – What other types of used vehicles should be excluded from the proposed standard.

Answer – Tractors and motorcycles – see the answer to question 6.

Question 14 – What procedures should the govt adopt to ensure that emission control equipment on used petrol and diesel vehicles is working and continues to function?

Answer – The motor trade will recommend regular testing (because they have a vested interest). This would result in unnecessary expense for vehicle owners. Emission equipment gives very little trouble and catalytic converters seldom fail now that there is no lead in our fuel. An education program on the virtues of regular tune-ups is all that is needed, don't upset the general public with unnecessary expense.

Question 16 – Where should emission testing be carried out?

Answer – For second hand imports before they leave the country of origin.

Question 17 – Should vehicles that have been de-registered and then re-registered or any other types of vehicle already in NZ be emission tested before being allowed to enter or re-enter the fleet?

IMPORTANT – This category will also include older vehicles when the licensing has lapsed for more than 2 years.

Answer – **ABSOLUTELY NOT**. Almost all vehicles in this category will be historic, unique or collectors vehicles.

Question 18 – Should any kinds of used vehicle be excluded from the requirement to have to pass an emission test at entry to NZ?

Answer – Yes unique/collectors, tractors, motorcycles, dual fuel and alternative fuel and hybrid vehicles for the reasons already explained.

Question 19 – Should the removal of, or the tampering with, a vehicle's emission control equipment be prohibited?

Answer – No it should be allowed but only under special circumstances. In the case of unique and collectable vehicles when new replacement parts are no longer available. If for example the engine management system or fuel injection fails it may be prudent to fit a carburettor and manifold off an earlier model with the same motor, or an after market computer, or to re-calibrate and fit an injector pump off a later model.

Question 20 – How should removal of, or tampering with, a vehicle's emission equipment be enforced?

Answer – Enforcement would be almost impossible, no-one is going to admit to it. You would have to be caught in the act. Also how do you define tampering as opposed to repairs and adjustments.

Question 21 – Should removal or tampering with control equipment on vehicles already in the fleet be prohibited or only to vehicles joining the fleet from the date the rule comes into force?

Answer – Not in the case of vehicles already in the fleet or re-entering the fleet –see our answer to question 19. It should only apply to imports other than unique/collectable.

Question 22 – How should the owner of a vehicle with modified emission equipment demonstrate that it still meets the standard?

Answer – Why should they have to. It would be a minefield for buyers of second hand vehicles, we would expect the authorities to have to prove it didn't meet the standard.

Question 23 – See answer to question 20.

On page 38 of the overview you comment about the cost of this proposal and quote \$25 to \$30 per vehicle for emission tests but this is not the true cost. Your chart shows the average age of a Japanese petrol import being 7 years in 2000 increasing to 8 years by 2006 and diesel vehicles increasing in age from 8 to 10 years in the same period. This would suggest a demand from consumers for cheaper vehicles. 7 to 10 year old vehicles may not pass your proposed test due to normal wear and tear, it's more likely that only near new vehicles will pass. This will increase the cost of second hand imports and increase the demand for older vehicles already in the fleet. It is possible they will go up in price.

Thank you for considering our submission.

Yours sincerely,

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