

Submission on Draft Land Transport Rule Vehicle Exhaust Emissions [2006] (Rule 33001/1)

from

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OVERVIEW

We strongly support emission screening because it is a great opportunity to draw driver attention, and public attention to pollution that degrades quality of life in our streets and neighbourhoods. Of particular concern to Living Streets Aotearoa is the health of children and wheelchair users, who are closer to the source of vehicle emissions due to their height. On a global scale, we are also concerned about greenhouse gas emissions, which are likely to be higher from poorly tuned vehicles.

However, we are concerned that the visual test proposed is purely subjective and not detailed enough. Earlier testing proposed by the Ministry of Transport was more in-depth and particular. This 5-second test picks out the very worst of the worst offenders only.

We would like to see more stringent testing (not relevant to issue) The test is described as a possible stepping stone for other emissions testing in future, a vague statement with no mention of when, or what this future testing will be. We believe that the persuasiveness of public education will determine the feasibility of such emissions screening. That is, any new controls will fail in parliament if the public is unconvinced and simply won't have them. The best way to reduce diesel pollution is to reduce unnecessary use of vehicles that use diesel and promote more active transport, and public transport.

Part of the aim of the testing is to set the scene for increasing future restriction of pollution, so that manufacturers will react accordingly, and the public will not think cars

are now 'perfect'. The first check should be as soon as possible after the car gets off the boat. That is a symbolic emphasis on New Zealand's wish to have clean air.

We wish to encourage making streets and neighbourhoods more suitable for enjoyment by the human community. Exchanges of friendship, goods and services happen more readily in low traffic streets and communities not taken over entirely by mechanized, noisy, polluting traffic. Reducing pollution from traffic is not just a matter of lungs, but of love.

Increasing evidence of the obesity epidemic means that walking to school and active transport for other activities is highly desirable. Adults and children don't want to walk alongside polluting vehicles.

Diesel buses should not be exempt from any testing regime since although they are more efficient than a series of individual cars, they can make streets noisy, dirty and unhealthy. It may be that the requirements are not the same for buses as for cars. Encouragement of cleaner public transport such as trolleys in Wellington, electric buses where overhead lines are not available, hybrid technology and LPG fuel is important. Given the current vehicles have sometime to go before they are likely to be replaced, a programme of moving the exhaust pipes to the right hand side of the vehicles, possibly higher up, would be beneficial to people walking, cycling, shopping and enjoying cafes along busy streets.

EURO 4

- What, if any, issues do you think there might be with delaying the introduction of the emissions standard known as Euro 4 for heavy diesel vehicles until 1 January 2008 for new-model vehicles, and 1 January 2009 for existing-model vehicles?

This would result in a delay in reduction of pollution, so that the change will be acceptable to the market and newer cleaner vehicles will be bought as required when available. It would appear this is required to have the new standards accepted but we prefer cleaner air earlier if possible. Every day we smell, see and hear noisy smelly poorly tuned vehicles.

- Should any of the other standards be amended at this time? Why do you think these should be amended?

Regulation 28 of the Traffic Regulations 1976

We concur with the Auckland Regional Authority's position on changes to be made to regulation 28 of the Traffic Regulations 1976, if this section is transferred into the Land Transport Rule:

“...we would like to see regulation 28 amended in the following ways and incorporated into the Land Transport Rule:

- Enforcing officers should only record the vehicle details (rather than pull the vehicle over) then phone in the complaint to a centralised database.
- In the case of a first offence, the vehicle owner should be required to have the vehicle’s emissions comprehensively checked, preferably using a “loaded” chassis dynamometer test such as DT80 for diesels or IM240 for petrols. If the vehicle fails the first test, then the owner should be required to have the vehicle serviced and re-tested until it passes rather than be fined (that way the \$150 fine could go towards the cost of improving the emissions performance of the vehicle).
- In the case of a repeat offence, the vehicle owner should be fined and required to have their vehicle pass a comprehensive emissions test before being allowed back on the road. This suggested approach maximises the ability for excessively smoky vehicles to be easily identified on the road yet minimises the time spent by Police in punitive enforcement.”

We feel the major advantage of involving police is the strong perception of serious ‘crime’ and antisocial behaviour. The main limitation to consider is not burdening the already-stretched resources of the police. Make it a brief, but decisive encounter that burdens the offensive driver instead with the effort of compliance.

VISIBLE SMOKE CHECK

- What, if any, issues do you think there might be in introducing a visible smoke check at vehicle inspections and how could these be resolved?

Testing stations and WoF garages’ main concern may be public relations - discontent from the public. This is best dealt with by skilful, good-faith preparatory communications with the public before the testing stations have to deal with it, especially making the testing stations look helpful rather than hindering. Emphasising that a well-tuned engine is cheaper to run may help this process.

- Do you know of any types of vehicle that should be specifically included or excluded from this visible smoke check? Why should that type of vehicle be included or excluded?

We oppose exempting any vehicle from the testing programme. One of our aims is public education that all vehicles pollute our streets and neighbourhoods. We also want to accentuate the ongoing trend towards tighter control as the scientific and public knowledge about pollution increases. Although we do not want to exempt any class of vehicle, we are wary of an absolutism that can destroy the programme. Therefore we suggest keeping a readiness to react if there arises a class or classes of vehicle that could reasonably be exempted/given latitude, such as emergency vehicles or vehicles of overwhelming usefulness that unexpectedly overrides the pollution consideration.

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Focussing on older (often badly polluting) vehicles is a valuable way of doing that, drawing attention at the same time to the cleaner air we enjoyed in the past when cars were fewer.

- Do you have any other comments about the visible smoke check?

Visible testing is not enough, as stated above. The emphasis needs to be on diesel particulate material, and nitrogen oxides. If possible in any way, take into account the ozone-creating catalysis effects of surrounding vegetation reacting with the volatile organic compounds from exhausts. Try to reduce ozone as well, as it is extremely destructive to the lungs of people in our streets and neighbourhoods. Greenhouse gases will also not show on visible tests and there is increasing concern about transport's contribution to climate change.

- Do you have any other comments about the overview?

Media campaign

We suggest a prolonged and skilful media campaign. We have admired the road safety publicity of the past few years, and recommend using the same methods, and even the same companies to do it. Without too many words, create a convincing graphic portrayal of (a) the pollution particles and chemicals and where they come from, and (b) the human misery and disease they cause, and the amount of it in society. E.g., get a fit young man to burn some powdered sulphur and breathe the SO₂, turning him into a wheezing, choking asthmatic in five seconds, then give him clean air to recover. Show a mother rushing a choking kid to emergency through thick traffic (kids are extra susceptible as their lungs are not good at coping with pollutants.) Do it carefully so as to retain credibility and attention.

DRAFT RULE

- Do you have any comments on *Section 3, Performance requirements of the proposed Rule*?

Characteristics could be used to establish vehicle bands for more intensive testing. We suggest that the test criteria might usefully extend beyond simple attention to pollution, and be weighted also to include the other ethical characteristics of vehicles, such as the seating-per-vehicle ratio (which affects the cluttering of our streets with cars), the 'necessity' of the vehicle (e.g. occupational classification - students using cars when they can easily cycle or bus). Also the criteria might consider known time-of-day of use of the vehicle (e.g. buses), because peak traffic causes huge increases in pollutants to dangerous levels. Geographical location of the licence might even be considered, weighting the requirement more heavily in densely populated areas.

Given the embodied energy represented in a vehicle's construction, we agree that different requirements for different vehicle ages is appropriate.

Thank you for the opportunity to contribute to the discussion on vehicle emissions.