

First, thank you for giving Living Streets the chance to offer our views regarding the proposed measures for controlling vehicle emissions.

**1. Do you have any comments about how emissions screening might affect vehicle owners?**

We strongly support emission screening because it will

- (a) Provide a great opportunity to draw driver attention, and public attention to pollution that degrades quality of life in our streets and neighbourhoods.
- (b) Add disincentives for owning a car (breathing fumes, cost and inconvenience of screening) and promote healthier active mobility and public transport instead. Please note, unlike most organisations, Living Streets does not want to ease the use of motor vehicles, of which there are far too many, but to reduce it.

Note: We believe that the persuasiveness of public education will determine the feasibility of emissions screening. That is, any new controls will fail in parliament if the public is unconvinced and simply won't have them.

**2. Do you have any comments about how emissions screening might affect the vehicle inspection and repair industries?**

Those industries presumably will profit from the extra business it generates (including noticed needs for repairs during the visits). The existing gas analysis equipment probably will be sufficient, so there may be little or no extra cost to the businesses. It may 'launder' the image of motor trades if they are seen to be trying to reduce pollution.

**3. What sorts of vehicle characteristics should be used to establish vehicle bands for emission performance limits (e.g. vehicle age, engine technology, and weight)?**

We suggest that the 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.

**4. Do you think the selection of pollutants for which performance limits are being proposed is appropriate?**

Yes. 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.

**5. Should the performance limits for newly imported used vehicles be more stringent than the limits for vehicles that are in-service?**

Yes. The idea is to publicize a pronounced trend towards tighter control of pollution, so that restriction will be less opposed as time goes on. It ties in with growing environmental awareness and responsibility.

**6. Do you see any practical difficulties in implementing different performance limits for vehicles in different bands? How could these be overcome?**

Yes, the motor trades are an aggressive and powerful self-interested culture that will try to obstruct by raising issues of inequality. A good strategy is to be initially 'attentive' for claims of unfairness, and to

Show good faith in addressing them, but retaining focus on the main health and quality of life issue, and retaining polite but firm control of the situation so to achieve good results.

**7. What is the best approach to ensure continuing improvements in the performance of the New Zealand fleet?**

As mentioned, the best way is to reduce the size of that fleet rather than unquestioningly pandering to it as if it must forever grow larger without any restraint. Please add as much constraint and cost and inconvenience as you possibly can.

**8. What is the best longer-term approach for improving the performance of diesel engines, particularly with respect to particulate emissions?**

Again, the best way to reduce diesel pollution is to do whatever is possible to make the use of them less convenient and more expensive, in favour of active transport, and public transport.

**9. Do you agree that the proposed hybrid framework is the most appropriate for the New Zealand situation?**

No. We feel that a centralized system is better because the quality of testing can be better from more serious sites than allowing scope for very permissive workshops to distort or falsify results to gain favour from customers. The centralised system makes the testing a more serious event. It also is less convenient to the motorist, adding more incentives to abandon vehicle use in favour of healthier transport, or enjoying living in their own neighbourhoods instead of polluting everyone else's.

**10. What would be the main issues for testing stations and WoF garages around participating in the proposed in-service emissions screening programme?**

Their 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 like good guys instead of meanies.

**11. What would be the main issues for TSDAs around participating in the proposed entry emissions screening programme?**

Again, public reaction, best dealt with in advance by deft publicity.

**12. How much lead-in time would TSDAs and WoF or CoF garages require to be suitably**

**equipped and trained to participate in the emissions screening programme?**

If the centralised method is used, the screening can probably be introduced more quickly. Six months might be sufficient, in parallel with the preparatory publicity. It is important that the go-live is reliably successful to retain respect for the whole programme.

**13. What difficulties would you anticipate for smaller or geographically isolated garages?**

The cost-benefit of the equipment could merit a cautious government subsidy. Policing of quality may be difficult in smaller sites. That is a reason favouring more-centralised testing. In smaller places the public attitude to pollution will be less concerned than in densely populated areas. This fosters breach of the requirements, with amused public sympathy.

**14. What would you see as the major issues for garages wishing to outsource the emissions screening test in order to continue providing WoF services?**

The serious inconvenience of arranging to-and-from delivery/pickup and parking instead of the simpler one-stop-shop event they are used to. This could totally eliminate the profit of the WOF. For this reason, the

Emissions test needs to be unbundled from the whole WOF, but still be a requirement before the WOF is granted. That is, the vehicle owner able to get most of the WOF one place, but the emission test done and signed off elsewhere to complete that WOF.

**15. Do you believe the simple tests proposed are the most suitable tests for the New Zealand situation?**  
We do not have sufficient information to judge.

**16. Are there any other practical implications of implementing simple testing that should be considered (including implications for equipment and facilities)?**

Again, we do not have enough knowledge of this to make a comment.

**17 Do you think that new vehicles should be exempt from the screening programme? If yes, at what age should a new vehicle have its first emissions screening check?**

No. As mentioned, part of the aim is 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 NZ's wish to have clean air.

**18. If new vehicles are exempt from screening tests, what is the best way to ensure new vehicles maintain their emission performance?**

The normal WOF, including the emissions test, would have to do. But we favour testing as soon as possible after arrival.

**19. Do you think older vehicles should be exempt from the screening programme? If yes, from what age should older vehicles be exempt and why?**

We oppose exempting any vehicle from the testing programme, regardless of age. 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. 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.

**20. Should any other vehicle types be exempt from the emissions screening programme and, if so, why?**

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, such as agricultural equipment, ships or trains.

**21. Do you think emissions screening should be required at every WOF?**

Yes. This is not only for the physical control of pollution, but as public education and to discourage the use of fossil-fuel-powered vehicles that degrade our streets and neighbourhoods.

**22. Do you think emissions screening should be required at every CoF?**

Yes. For the same reasons as in 21. We want to encourage the re-localisation of both business and private life in preparation for imminent scarcity and very high cost of fossil fuels ('peak oil'). At the moment, much pollution is caused shipping goods and people long distances unnecessarily just because fuels have always been very cheap and abundant.

**23. Do you agree that newer vehicles should have less frequent emissions screening checks than older vehicles? If yes, at what age should screening start and at what age should it become more frequent?**

No. The test needs to be the regular WOF or COF, to face the public with the fact of pollution rather than denying or evading responsibility for it.

**24. Do you think any changes should be made to regulation 28 of the Traffic Regulations 1976, if this section is transferred into the Land Transport Rule?**

We concur with the Auckland Regional Authority's position:

"...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.”

**25.What would you see as the main advantages and limitations of enforcing the emissions performance limits?**

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.

**26.Do you have any views or opinions about the use of supplementary on-road enforcement options?**

The entire purpose of Living streets favours personal human exchanges rather than impersonal, mechanised or electronic methods that our over-automated environment has developed. We therefore prefer respectful police interaction with offenders.

**27.Do you have any further suggestions on how the introduction of the emissions screening programme could be performance requirements?**

Yes, 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 SO<sub>2</sub>, 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 not to retain credibility and attention.

**Additional Comments**

Please include in the discussion the issue of making streets and neighbourhoods more suitable for enjoyment of human community - exchanges of friendship, goods and services, rather than being taken over entirely by mechanized, noisy, polluting traffic. Contrast low-traffic streets with heavy-traffic ones. Make it not just a matter of lungs, but of love.

Bruce Thomson, on behalf of Living Streets Aotearoa  
[bthomson@e3.net.nz](mailto:bthomson@e3.net.nz)

20 Lyndhurst Street, Palmerston North, New Zealand  
06 357-7773 or 357-7889

Or

115 Holloway Road, Wellington, New Zealand  
04 385-4777