

From: [REDACTED]
To: [Clean Cars](#)
Subject: Response to LEV discussion document
Date: Sunday, 4 August 2019 11:10:08 PM

I have answered the online survey, and include the responses below, and would like to be kept informed of any further developments and research conducted on transport emission reductions.

Thanks

Paul Bruce

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[REDACTED]

1: A clean Car standard is so far overdue that it may not be relevant today because of the more stringent measures now needed to address the climate emergency facing us

2: This target is a good beginning point. However, we need to schedule the end of imported fossil fueled vehicles by 2030 in common with other countries who are taking seriously the climate crisis we now face.

3: People on medium to low incomes are very sensitive to price signals, and as polls indicate that 80% already desire to move to low or zero emission vehicle, this will clearly have an impact on sales. However, it is important that the price incentives/rebates are passed directly to the purchaser of new vehicles. At the higher end of the market, the price is likely to have a minimum impact, as it will only be a small percentage of the sale price.

4: Yes, except for the higher end of the market, where the price is likely to have a minimum impact, as it will only be a small percentage of the sale price. The penalty fee has to be steadily increased beyond 2025, until at a future date such as 2030, imports are no longer permitted. Used vehicles could be permitted for another ten years, when they should also be phased out. The justification of this, is that any vehicle has an embodied energy similar to the fuel that it uses in its lifetime. So once it is purchased, then it makes sense to allow the more efficient vehicles to be used for another ten years. Emission standards should be gradually tightened up to this cut off point in 2040.

5: This exception is difficult to understand, as this exemption for three or less vehicles would be a loop hole for those who can afford to import independently, especially luxury vehicles.

6: Prefer multiple targets, as this allows time for standards to increase over a wider range of vehicles giving better choice. However, the emission target should further decrease to zero by 2030, and then a similar series of targets enforced over the following ten years for the second market.

7: Yes, but with the proviso that it is continued to zero by 2030 (over the following 5 years).

8: It is understandable that larger vehicles utilised in some industry will have higher

emissions. However, it is important the average standard continues to increase, and that it reaches zero in the following 5 to ten years, preferably 2030.

9: Yes, the absolutely needs to be a penalty, though this amount should increase towards the end date. We are facing a climate emergency, and we must enforce a fast transition. There is a cost to the purchaser, but the cost to the global community of catastrophic climate change is far higher.

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11: Yes, however, this credit should only be allowed for one or two years into the future.

12: Yes, however, this credit should only be allowed for one or two years into the future.

13: This seems sensible

14: I agree that this adds too much complexity to the scheme.

15: However, this fine may need to be higher, in the case of large vehicle.

16: However, this fine may need to be higher, especially for a large importer

17: Absolutely - the severity of a dealers impact on green house emissions when not complying is not to be underrated.

18: The WLTP will be adopted internationally with the exception of the United States. It was adopted in Europe in October 2017. Japan promulgated regulations adopting the test procedure in October 2017 and Korea is also expected to adopt the WLTP

19: No - the proposed process for setting future emission targets where the Government sets most immediate 5-year target, and proposes targets for two future periods is not tight enough. The 2050 end date should be brought back to 2030 for new imports and to 2040 for the existing fleet.

20: The initial fee is ok, but needs to ramp up as a terminating date of 2030 and 2040 are approached.

21: yes

22: yes

23: yes

24: The approach is good.

25: Sounds sensible

26: This band should be adjusted to a lower level at regular intervals

27: Not sure

28: sounds sensible

29: Sounds appropriate