

*Submission on  
Land Transport Rule 33001/2 Vehicle Exhaust Emissions 2007  
29 June 2007*

*Complete as per part one of on-line submission form.*

*On behalf of the Left Hand Drive Enthusiasts Federation (LHDEF).*

Jeff Tobin  
Left Hand Drive Enthusiasts Federation  
FREEPOST, PO Box 83-183 Edmonton Auckland.  
Email: jefftobin@xtra.co.nz

**Confidential Information**

No part of our submission is confidential and is available for public dissemination, as well as to other interested parties for comment.

The Left Hand Drive Enthusiasts Federation represents a number of left hand drive enthusiast clubs, associations and individuals including but not limited to Mustang and Corvette clubs, BMW owners Club, Ferrari Owners' Club, NZ Buick Enthusiast club, American Muscle Car Club, American Classic Car Club, Pukekohe Hot Rod Club, Cadillac La Salle, N.S.R.A.

**LHDEF Views**

The LHDEF understands the need for improving vehicle emission standards and the Government's stance on this subject.

The LHDEF is strongly supportive of the section 1.3(1) (a, b, c, d and f) of the yellow (consultation) draft of *Land Transport Rule*, being proposed exemptions including Subclauses 2.7(d)(e) and (f) of the yellow (consultation) draft of Land Transport Rule: Frontal Impact 2001. In particular interest to our group and other hobby motorist organisations are Subclauses 2.7 d & f:

**We strongly feel that collectible vehicles should be excluded from the vehicle exhaust emission rule as proposed.**

We understand that a definition of collectible vehicles will apply to newer than 20 year old vehicles as per the Frontal impact amendment rule and in this case will only apply to vehicles manufactured after 1990 due to vehicles prior to 1990 being excluded from the vehicle exhaust emissions rule.

As at the date of this submission we understand that a definition of "collectible" is being worked upon by LTNZ.

The LHDEF recognise and support the consistency of the legislative approach with regard to exemptions as outlined in the pending Frontal Impact legislation.

We welcome the opportunity to be involved in the forming of a definition of collectible for inclusion in the rule.

Not all the questions would concern LHDEF member clubs, however we will pass on our thoughts on the following questions.

**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.

**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.

Removal of emissions equipment from vehicles already in the fleet will be difficult to police, especially for older vehicles whose emissions equipment may no longer be available. Also the Hot Rod and Street Rod community will be heavily impacted as they use an amalgamation of parts from different eras. For example, the base vehicle may be 50 years old but the drive train may only be 5-20 years old.

This rule would be more effective if it were not retro applied. New entrants to the fleet should have emissions equipment at a standard which meets the manufacturer's original emissions specifications. They may not necessarily be OEM equipment.

For example, in the USA, aftermarket exhaust systems are common. They meet emissions regulations but are not original. They will have original emissions electronics but may have a high performance catalytic converter fitted.

The LHDEF proposes the rule should read. ***The vehicle may be modified but must meet or exceed the original manufacturer's specifications for emissions for that particular vehicle.***

**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. In terms of modified vehicles, it is estimated that these modified vehicles are only a small proportion of the fleet and have been modified to enhance performance or overcome parts shortages rather than with the intention to create a less emission friendly automobile.

It is our submission that due to limited usage, the work and effort to identify these vehicles is in inverse proportion to any possible additional emissions they create.

**Note the comments in Question 19 above.**

**Environmental Impact (2013)**

In 2013 only being able to import a vehicle under 4 years of age does not make effective environmental sense and should be reviewed.

We have previously submitted a view point on this and repeat appropriate information here on environmental impact.

Newer vehicles create lesser emissions, have additional safety features and have an extended life cycle. However, there are other factors to consider that affect the environment. The following excerpts from accepted literature illustrate this:

Automobiles are among society's most resource intensive products. There is an environmental cost-benefit trade-off between investing extra energy and materials in a new,

more energy efficient and less polluting automobile versus continuing to operate and maintain an older, less efficient and more polluting vehicle.<sup>[i]</sup>

The assumption is that when a buyer can source a car that closely meets their needs and is in very good condition, and they are appropriately educated, they are more likely to keep it longer and look after it better – more eco-efficient ownership benefiting the owner and the environment<sup>[ii]</sup>

Although car manufacturers promote the quick turnover of motor vehicles the manufacture and disposal of motor vehicles is demonstrably resource intensive.

Longer ownership periods (18 year intervals) provide a life cycle minimising CO2 emissions and energy use. When damage cost factors are included to estimate the external cost of pollution to society intermediate replacement intervals of 10-14 years are favoured<sup>[iii]</sup>

[i] Spitzley, Grande, Kim, Keoleian Life cycle Economics and replacement Optimization for a generic US family sedan. World Congress 2005 Paper 2005-01-1553

[ii] Auto Angels Vehicle maintenance scheduling LA USA 2007

[iii] Spitzley, Grande, Kim, Keoleian Life cycle Economics and replacement Optimisation for a generic US family sedan. World Congress 2005 Paper 2005-01-1553

The artificial constraints through emission regulations on the length of vehicle ownership could have a negative environmental impact. This would be due to the wastage of resources in the creating and then destruction of a high volume of vehicles which otherwise would have the ability to provide operating performance well beyond four and even ten years.

The LHDEF has no further points to make but again recognises the need to reduce harmful emissions albeit in a balanced and well thought out Government policy.

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