

To whom it may concern,

I'd like to provide feedback and suggestion regarding the transition to lower emission economy, especially transport, and Electric Vehicle (EV) uptake in New Zealand. The Draft report explores options that were used in other countries, and perhaps may not be fitting into the New Zealand Specific context.

Locally in New Zealand, most vehicles are imported second hand, from countries such as Japan. This is also true for the current fleet of Electric Vehicles. The authors of the draft report did not seem to consult with majority of current, and future EV owners – again, most of them will be second hand EV imports.

Policy should be aiming at allowing imports of second hand EV, and more importantly, extended life expectancy of second hand EV vehicles. The most important component, traction battery used to power the vehicle, naturally de-generates with age and number of charging cycles. In the vehicles' original market, it is possible, to get a replacement battery, shall the current one degrade to make it less useful. However in New Zealand, the most popular EV – Nissan Leaf, for example, cannot have its battery replaced if the vehicle is a second hand import. Even though its physically possible, Nissan's Intellectual Property (IP) by design prohibits the battery to be swapped in New Zealand. If a New Zealand owner of the most popular second hand EV wants its battery fully replaced, he/she has to send it all the way the original country of registration, i.e. possibly to Japan. This is very costly and this is what limits the uptake of EV in New Zealand. Therefore I would like to recommend that government enables :

- Owners of second hand imported EV need to have option to swap the traction battery in New Zealand. This can be achieved if Government works with automakers so that they open their Intellectual Property (IP), to allow government – selected organization, such as VTNZ or NZTA, perform the full battery replacement, at an affordable price, ex-works cost of the new battery.
- Owners of second hand imported EVs need the ability to offset the cost of replacing the battery via a well-defined tax credit.

Price subsidy for new electric vehicles as recommended in the draft report will have marginal effect, as the affordability of them even with the subsidy will be still low considering low real incomes in New Zealand. The working group needs to consider making the life of everyday EV user – second hand imported EV driver – easier and without the doubt of being left alone when the battery fails because in New Zealand the battery swap is not possible.

Best Regards,

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