



## SUBMISSION

---

Submission: Charging Our Future: A draft long-term electric vehicle charging strategy for Aotearoa New Zealand

To: Ministry of Transport, Te Manatū Waka

Date: 11 May 2023

Contact: Billy Clemens, Policy Advisor  
La Ara Aotearoa Transporting New Zealand  
[billy@transporting.nz](mailto:billy@transporting.nz)  
04 471 8283

Dom Kalasih, Interim CEO  
La Ara Aotearoa Transporting New Zealand  
[dom@transporting.nz](mailto:dom@transporting.nz)  
04 472 8285

## About Ia Ara Aotearoa Transporting New Zealand

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry. Our 1,200 member companies operate urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand's purpose is creating the environment where trucking operators can drive successful, safe, sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

Transporting New Zealand's commitment to responsible emissions reduction is set out in the [Green Compact: our framework for decarbonising commercial road transport by 2050](#).

New Zealand's road freight transport industry employs 33,000 people (1.2% of the total workforce), and has a gross annual turnover in the order of \$6 billion. This is part of a wider transport sector that employs 108,000 people and contributes 4.8 percent of New Zealand's GDP. Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand (MoT National Freight Demands Study 2018).

## Charging our Future Consultation Questions

Transporting New Zealand appreciates the opportunity to make a submission on a draft long-term electric vehicle charging strategy.

Reference	Question	Response
Introduction	1. Do you have any comments about the institutional arrangements for implementation set out in Annex 2, or on the way central government should work with the private sector when implementing the final version?	<p>Transporting New Zealand would prefer an inter-agency approach, led by a well-resourced and high-powered unit within an existing entity, as opposed to a new departmental agency or public sector department. Resourcing should be targeted towards the Strategy's focus areas and actions, rather than institutional restructuring.</p> <p>Codifying a working arrangement with a non-government group or groups, focussed on heavy vehicle charging (buses and trucks), should be prioritised in the Strategy.</p> <p>Transporting New Zealand refers to the finding of the International Council on Clean Transportation's December 2022 White Paper <i>Charging Solutions for Battery-Electric Trucks</i> that upfront coordination between electricity utilities, commercial fleets, transport authorities, and energy commissions is critical in addressing barriers to fast and efficient deployment of charging infrastructure (pg. 25).</p>
Why have a strategy for EV charging	2. If there are drivers missing, what are they and what impact do you think they would have on the content of the final strategy?	<p>An additional driver for the Strategy is New Zealand's ambitious targets for emissions reduction and zero emission vehicle uptake in the freight transport sector. This should be distinguished from light vehicle EV uptake, that is significantly exceeding forecasts and rapidly building its own momentum.</p> <p>There is currently a serious disconnect between New Zealand's targets in the Emission Reduction Plan and the Global Memorandum of Understanding on Zero-Emission Medium- And Heavy-Duty Vehicles, and the lack of preparatory work being done around heavy vehicle charging infrastructure.</p> <p>If these targets are to be credible, work towards Outcome 5 and the associated Focus Areas must be prioritised. The International Road Transport Union (the European industry peak body) made a similar submission last year regarding EU regulations. Without an effective roll-out of heavy vehicle recharging infrastructure, operators will continue to choose diesel powered</p>

		vehicles over clean alternatives, in order to maintain efficient freight movement and satisfy customer demands.
Baseline: the current state of charging infrastructure Our vision for Aotearoa New Zealand's EV charging infrastructure	3. Do you agree with this description of the status quo? Is anything missing from this description of the status quo?	<p>Transporting New Zealand agrees with this description.</p> <p>However, the statement that “zero emissions trucks only make up 1% of our heavy vehicle fleet” at page 29 of the discussion document appears to overstate New Zealand’s progress to date. In 2021, 99.6% of trucks entering the fleet were diesel-fuelled and this value has been steady since the year 2000 (MoT Annual Fleet Statistics 2021 pg. 7). This highlights the scale of the challenge associated with fleet electrification.</p>
	4. Do you think this draft vision serves as a useful guide for the EV Charging Strategy? If not, what is missing from the vision?	<p>Transporting New Zealand submits that greater emphasis should be placed on heavy vehicle charging, rather than simply accommodating and recognising where other vehicle modes may fall within scope.</p> <p>Transporting New Zealand accepts there is uncertainty in the relative proportions of zero emission heavy vehicles that will be battery electric compared to hydrogen. There are also promising technological alternatives to wired stationary charging currently in development. The Strategy should acknowledge these unknowns, and manage the “regret cost”. New Zealand will be a technology taker in the low and zero emission vehicle space, so adaptability will be a key aspect of a successful Strategy.</p> <p>There is important preparatory work that the Strategy can prioritise. This could include preliminary research, industry consultation and charger number modelling, regulatory work around inter-operability and charging standards, land consenting, and piloting public heavy vehicle charging infrastructure.</p>
Five long-term outcomes support the vision	5. Do you agree with the proposed outcomes? If not, please explain why.	Yes.
	6. Should the final strategy focus on more or different outcomes? If so, please	Transporting New Zealand submits that greater focus should be placed on Outcome 5. Electrifying the heavy vehicle fleet will be significantly more challenging than for light vehicles. Establishing an adequate charging network

	identify what these outcomes should be.	will require significant financial and regulatory support from Government, in partnership with industry. Preliminary work can begin immediately (as set out in our previous responses).
	7. Do you consider any of these outcomes more important than the others? If so, which one(s) and why?	Transporting New Zealand emphasises the relative importance of Outcome 5, given the significant challenges associated with electrifying the heavy vehicle fleet.
Outcome 1: Our national EV charging system is underpinned by affordable, reliable, secure and safe power supply and infrastructure	8. Do you agree with the focus area under outcome 1? If not, please explain why.	Yes.
	9. Which further actions under Focus area 1a would you prioritise? Please explain your answer.	Transporting New Zealand has no feedback to provide.
	10. Please provide any comments on the timing of completing these actions.	Transporting New Zealand has no feedback to provide.
Outcome 2: All EV users can safely access and use EV charging when and where needed	11. Do you agree with the focus areas under outcome 2? If not, please explain why.	Yes.
	12. Which further actions under Focus areas 2a and 2b would you prioritise? Please explain your answer.	Transporting New Zealand submits that implementing a consistent, practical planning and approval process across councils should be prioritised. This preliminary work will be essential to enabling a cohesive national charging network across Aotearoa's 78 local authorities.
	13. Please provide any comments on the timing of completing these actions.	Transporting New Zealand would support the implementation of a consistent, practical planning and approval process across councils as soon as practicable.
	14. Are there any actions needed to reflect the	Transporting New Zealand has no feedback to provide.

	particular EV charging needs of disabled communities, Māori, or other groups? Please explain your answer.	
	15. Please provide any comments relating to targets for EV charging infrastructure.	Transporting New Zealand has no feedback to provide.
Outcome 3: Aotearoa's EV charging system is underpinned by integrated and streamlined cross-sectoral planning and standards	16. Do you agree with the focus areas under outcome 3? If not, please explain why.	Yes.
	17. Which further actions under Focus areas 3a, 3b, and 3c would you prioritise? Please explain your answer.	<p>3a: Support local authorities to implement the required public charging infrastructure. Without central government resourcing and support, local authorities may lack the funding and technical expertise to develop a cohesive national charging network.</p> <p>3b: Transporting New Zealand supports both additional actions. Optimising data capture and use is essential to ensuring ease of use and confidence in the charging network. The charging network must be clearly mapped and provide accurate information about pricing and heavy vehicle compatibility.</p> <p>3c: Transporting New Zealand supports all three additional actions.</p>
	18. Please provide any comments on the timing of completing these actions.	Transporting New Zealand would support the implementation of all Outcome 3 actions as soon as practicable.
Outcome 4: Aotearoa's EV charging market functions	19. Do you agree with the focus areas under outcome 4? If not, please explain why.	Yes.

effectively, can adapt and evolve over time, and is attractive to users, operators and investors	20. Which further actions under Focus areas 4a and 4b would you prioritise? Please explain your answer.	Transporting New Zealand has no feedback to provide.
	21. Please provide any comments on the timing of completing these actions.	Transporting New Zealand has no feedback to provide.
Outcome 5: Our national EV charging system supports the transition to, and use of, low- and low-emissions transport modes across the wider transport system	22. Do you agree with the focus areas under outcome 5? If not, please explain why.	<p>Transporting New Zealand strongly supports focus area 5a. Electrifying the heavy vehicle fleet will be significantly more challenging than for light vehicles. Establishing an adequate charging network will require significant financial and regulatory support from Government, and preliminary work can begin immediately (as set out in our previous responses).</p> <p>Transporting New Zealand is broadly supportive of focus area 5b. However, we submit the Strategy should focus on road transportation, to avoid mission creep. The charging requirements in the aviation, marine and off-road space will presumably be quite mode specific, that will make them a lower priority for the national charging network.</p>
	23. Which further actions under Focus area 5a or 5b would you prioritise? Please explain your answer.	<p>Focus area 5a:</p> <p>Prioritising the provision of heavy vehicle charging in new light vehicle charging developments. Failing to do so will require expensive expansion and retrofitting in the medium to long term.</p> <p>Investigating co-funding, subsidies and incentives that would enable transport operators to install depot charging facilities (including higher capacity electricity connections). The cost of private charger installation is substantial and will pose a barrier to adoption. Road freight transport is a low margin industry, with operating profit margin typically in the order of 3-5 percent (New Zealand Institute for Business Research, University of Waikato 2020).</p>

	<p>24. Please provide any comments on the timing of completing these actions.</p>	<p>Transporting New Zealand supports Outcome 5 actions commencing as soon as practicable, particularly foundation work that minimises regret cost. This could include preliminary research, consultation with freight operators, charger number modelling, regulatory work around inter-operability and charging standards, streamlining land consenting, and piloting public heavy vehicle charging infrastructure.</p> <p>Codifying a working arrangement with a non-government group or groups, focussed on heavy vehicle charging (buses and trucks), should also be prioritised. This can be done ahead of the delayed New Zealand Freight and Supply Chain Strategy being finalised.</p>
--	---	--

ENDS