



Helping New Zealanders Build & Modify Safe Vehicles

Low Volume Vehicle Technical Association Incorporated
PO Box 50600, Porirua
Wellington
New Zealand

29 July 2021

By email to energymarkets@mbie.govt.nz

To whom it may concern

Re: Low Volume Vehicle Technical Association (LVVTA) submission on Sustainable Biofuels Mandate

A brief overview of LVVTA

Although not a government department, LVVTA is contracted to administer modified vehicle standards and the Low Volume Vehicle certification system on behalf of Waka Kotahi NZTA. LVVTA (an incorporated society) was established due to an impending change in vehicle regulations in the 1990s. Now, some 29 years after its inception, the LVV system, managed and developed by LVVTA, is generally-considered to be amongst the best in the world for both vehicle owners and government alike. It is a system for modifiers, administered by modifiers, and supported by the regulator.

The LVVTA is comprised of eight member associations, Constructors Car Club Inc, Kiwi Trikers Social Club Inc, Motorsport New Zealand Inc, New Zealand Four Wheel Drive Association INC, New Zealand Hot Rod Association Inc, New Zealand Motor Caravan Association Inc, Sports Car Club of New Zealand Inc, and The Vintage Car Club of New Zealand Inc. Most of these are hobbyist groups which would be adversely affected by motor vehicle legislation enacted without their interests being represented during the development process.

The LVVTA mission statement

"Promote and retain the right of New Zealanders to use motor vehicles on the public road that have been modified, or constructed in limited volumes, for sporting, recreational, special mobility, or business purposes".

LVVTA position on the Sustainable Biofuels Mandate

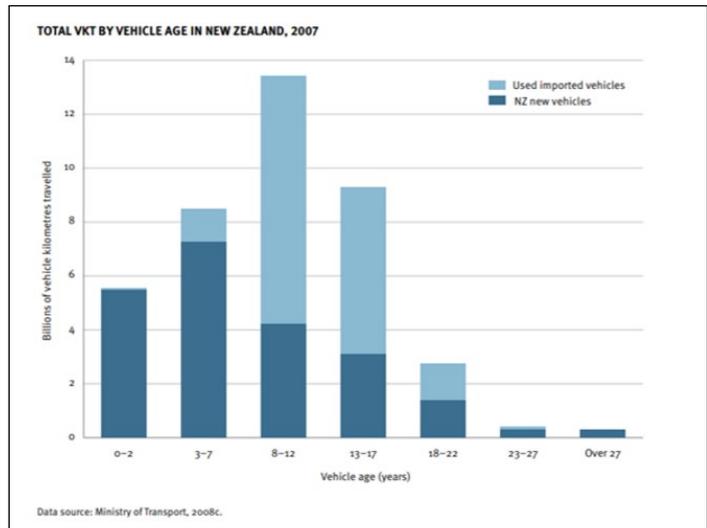
LVVTA supports the Sustainable Biofuel Mandate in principle, however we would like to signal some possible flow-on effects that would impact owners of vintage, classic, and collectable vehicles. The current ethanol blend fuels available in New Zealand are largely unsuitable for these types of vehicles due to the corrosive nature of ethanol on fuel system components, and issues with elastomer compatibility causing seals, diaphragms, and flexible hoses to shrink, swell, and/or crack.

This has potentially serious implications in terms of fuel leaks and ruptures causing vehicle fires, endangering lives and property.

Due to the nature and value of vintage, classic, and collectable vehicles, most owners usually only drive them on sunny days, weekends, or to attend organised events. Because of this, the bulk of these vehicles do not travel many kilometres each year, and are not the primary vehicle being used for daily commuting by their owners. Therefore, their emissions are negligible in relation to pollutants emitted from the entire NZ vehicle fleet. The potential consequences of removing access to non-ethanol fuels will have a disproportionately large effect on a hobby that relies on the continued availability of fuels that are compatible with older vehicles.

The chart below is dated 2007, with the over 27 year graph showing vehicles that would be 40 years old in 2020 which best represents the age bracket the bulk of vintage, classic, and collectible vehicles fall in to. It would be reasonable to conclude that the kilometres travelled will have decreased further as the vehicles have aged.

LVVTA agrees with the need to decrease emissions from New Zealand’s vehicle fleet (and diversify from our reliance on fossil fuels as a nation), and with support from Waka Kotahi NZTA, LVVTA has developed an Electric Vehicle Standard. The purpose of this standard is to allow modifiers to convert vehicles that currently utilise internal combustion engines to battery and electrical propulsion. Like New Zealand’s EV uptake, demand for this was minimal when the standard was first released in 2012, however the number of modifiers utilising new and emerging EV technologies to carry out EV conversions is increasing each year.



Summary

As vintage, classic, and collectable vehicles travel minimal kilometres each year, the quantity of CO₂ emissions is negligible and may be considered as offset by the increasing number of EV conversions being certified through the LVVTA system.

LVVTA would like to see continued availability of current-grade non-ethanol fuels for vehicles that are not intended or designed to use ethanol blends, until a second-generation biofuel or blend becomes available that can be used directly in these older vehicles. This would allow for the continued use of vintage, classic, and collectable vehicles for the enjoyment of both the wider public (who would be able to view these vehicles being used on the road and involved in events or car shows), and for the owners’ continued ability to restore, maintain, drive, and enjoy their vehicles.



Picture: Classic 1970 MG BGT converted to an Electric Vehicle

Kind regards



Withheld under section 9(2)(a)

Ken McAdam
LVVTA Operations Manager