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## **SUBMISSION**



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By email: regulation.branch@comcom.govt.nz

## MTA feedback on fit for purpose regulation

## Introduction

The Motor Trade Association (Inc) (MTA) was founded in 1917 and in 2017 celebrated 100 years of trust with the NZ motoring community. MTA currently represents approximately 3,800 businesses within the New Zealand automotive industry and its allied services. Members of our Association operate businesses including automotive repairers (both heavy and light vehicle), collision repair, service stations, vehicle importers and distributors and vehicle sales. The automotive industry employs 57,000 New Zealanders and contributes around \$3.7 billion to the New Zealand economy.

## Submission

MTA supports New Zealand's low carbon goals and ensuring an uptake of low emission transport options, including electrified and alternative fuel vehicles.

Consumers need to have confidence that the transition to the transport journey of the future will be as familiar as possible to their journey today. With respect to vehicle driving, a key concern will be fuelling their vehicles, whether it be electric or some other fuel alternative (biogas, hydrogen, etc). MTA understands such a large transition (in driving/transport modalities) requires a change in behaviour. The Commerce Commission is well placed as a regulator to ensure energy infrastructure and network resources are used in the most beneficial way to ensure the transition is easier for New Zealanders.

MTA agrees with the sentiment of the Commission's approach in its role as regulator. We want to ensure the industry can innovate and diversify in a way that New Zealand can leverage all available low emission technologies and work towards a low/no carbon future.

MTA sees a huge role for existing fuel distribution networks (retail service stations) to align with the electricity and gas networks. Such a move will make the transition to EVs and other low emission vehicles easier for consumers, as they are already aware and familiar with the location of service stations. The location of these fuelling sites has naturally evolved through response to consumer demand to the most logical or intuitive locations on well-travelled and accessible routes.

MTA submits that for energy regulation to be fit for purpose, it must consider fast charging and alternate fuel infrastructure (for public, commercial facilities) and robust charging connections in the home. The Commission must work closely with teams within MBIE that deal with housing, electrical safety, and energy to provide for smooth pathways for transition. To adapt to new low emission activities in the New Zealand transport industry, there will need to be significant changes in infrastructure in commercial buildings and private homes.

Thank you for the opportunity for MTA to provide comment on the energy and airports regulation regarding the views of and its effect on the automotive industry.

Yours sincerely,

**Greig Epps** 

**Advocacy & Strategy Manager** 

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<sup>&</sup>lt;sup>1</sup> In broad terms, MTA sees future transport options for private travel revolving around highly efficient internal combustion engines and electric modes (hybrid and full battery), while light commercial and heavy transport will need a mix of electric, hybrid, alternate fuels, and hydrogen.