

## Amendments to Land Transport Rule: Vehicle Exhaust Emissions 2007

### Yellow Draft – August 2008

This submission refers to the above proposed rule changes to the rule Vehicle Exhaust Emissions 2007 section 10 and in particular 10.1(4) and its sub parts.

#### 10.1(4) 2.3

The procedure specified and required as per figure 11-2-2 is unmanageable.

It does not sample peak emissions, sampling is specified during deceleration, it demands a two person operation, do they both have to be approved testers(operators) if not which one must be,

it requires split second timing between an throttle man inside a vehicle and another at ground level, likely at the rear point of the vehicle being tested

the unnecessary health and safety issues imposed upon individuals who are required to expose his/her face to an engines full throttle exhaust emissions is going to draw serious repercussions for the business operators from OSH and is not practicable or acceptable and will prove intolerable

some operators are required to place extractor ducts at the point of the tail pipe to satisfy minimum OSH requirement regarding Carbon Monoxide (and particulates) buildup within their facility , the repeated insertion of the test probe will be most difficult when utilizing such extractor systems unless inserted pre test and left in situ during the test process.

A preferred method of inserting the probe, testing and recording repeated snap accelerations eliminates all of the above concerns and is applied else where in the world.

**Note;** *all our workshops utilize test equipment based on the light Absorbtion(!!) measurement method*

#### 2.4 Measured values.

It would appear that the standards set within this section are to be considered achievable only by vehicles designed and equipped with the latest exhaust treatment technology. It does not give due regard to the New Zealand vehicle fleet age and emissions standards those engines were designed to achieve.

It is possible an error has occurred in establishing this test criteria.

This submission is for and on behalf of Emissions Testing New Zealand.

For ETNZ

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