

August 18, 2017

Ms. Valérie Vendette

Direction des programmes et de la mobilisation

Ministère du Développement durable, de l'Environnement et de la Lutte contre les
changements climatiques

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Sent via e-mail: valerie.vendette@mddelcc.gouv.qc.ca

Re: comments on Quebec's draft regulation for a Zero Emission Vehicle Standard

Dear Ms. Vendette:

We appreciate the opportunity to provide comments to the draft regulations under Bill 104 for a Zero Emission Vehicle (ZEV) Standard in Quebec. First, we would like to commend your government for taking a strong position in support of zero or near-zero tailpipe emission vehicles in Quebec. Below are our recommendations that we think would improve the overall efficiency of the Standard and help you meet your greenhouse gas (GHG) emissions targets:

Comprehensive Coverage:

- Include the classification of “motor vehicles” covered within the ZEV Standard. Does it apply only to personal vehicles, sport utility vehicles and/or commercial vehicles?
- We recommend that the ZEV Standard also include light and medium duty vehicles, particularly busses and inner city delivery trucks which currently have zero and low emission options. Research has shown that freight is the fastest growing segment within the transportation sector. In fact, Canada's 2nd Biennial Report on Climate Change projects that freight emissions will eclipse passenger emissions around 2030. We believe that addressing the environmental impact of freight will be critical to helping you meet your GHG targets — not to mention the additional benefits of relieving road congestion,

more cost-efficient business practices, and improved air quality, particularly in urban centres.¹

- We agree that different sized manufacturers should have different compliance obligations, however we recommend that all manufacturers be covered within the Standard, including the “small volume manufacturers” as defined in the draft regulation. This would offer the greatest opportunity to advance clean technology and get you closer to meeting your greenhouse gas emissions obligations.
- The vehicle manufacturers’ categories identified in Section 4 of the draft regulations should be determined with the Quebec market vehicle sales in mind. For example, Quebec’s vehicle market is 4.2 times smaller than that of the market in California.² Therefore, we suggest that the proposed thresholds for large, intermediate and small volume manufacturers be adjusted proportionally downward.
- Define “manufacturer” as the parent company of all its brands and subsidiaries.

Determining Electric Range

- We recommend that the standard used to determine the electric range of the motor vehicle include cold and hot climate considerations, as well as driving habits. We recommend using NRCan’s 5-cycle range assessments for city and highway fuel consumption ratings, which include the standard (2-cycle) tests plus three additional test cycles to more accurately reflect real-world driving conditions one would expect in Canada – cold temperature operation, air conditioner use, and speed.³

Credit generation

- We recommend that you include language in the regulation that specifically spells out that credit generation of any vehicle can only occur once.

¹ Plumptre, Bora, Eli Angen and Dianne Zimmerman. *The State of Freight: Understanding greenhouse gas emissions from goods movement in Canada*. The Pembina Foundation, 2017

² Based on total vehicle registrations. For Canada, Statistics Canada (2017) Motor vehicle registrations, by province and territory – 2016. <http://www.statcan.gc.ca/tables-tableaux/sum-som/101/cst01/trade14b-eng.htm>. For California Department of Motor Vehicles (2016) Statistics for Publication – January through December 2016. https://www.dmv.ca.gov/portal/wcm/connect/5aa16cd3-39a5-402f-9453-0d353706cc9a/official.pdf?MOD=AJPERES&CONVERT_TO=url&CACHEID=5aa16cd3-39a5-402f-9453-0d353706cc9a

³ NR Can 5-cycle testing, <http://www.nrcan.gc.ca/energy/efficiency/transportation/cars-light-trucks/buying/7495>

We appreciate the opportunity to provide comments. Please don't hesitate to contact us should you have any questions.

Yours sincerely,

A handwritten signature in black ink that reads "Dianne Zimmerman". The signature is written in a cursive style with a long horizontal flourish at the end.

Dianne Zimmerman

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A handwritten signature in black ink that reads "J. Moorhouse". The signature is written in a cursive style with a long horizontal flourish at the end.

Jeremy Moorhouse

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