

03/08/2023

Attn: Waka Kotahi

Re: E-scooter declaration renewal decision

Tēnā koe,

Thank you for the opportunity to offer feedback and opinion on the decision whether or not to renew the E-scooter (Declaration Not to be Motor Vehicles) Notice 2018.

OraTaiao: NZ Climate and Health Council does not support the renewal. While we understand that e-scooters give an additional option for mobility, there are significant health concerns under the current use legislation with no evidence of more widespread public health benefits from mode shift away from inactive forms of travel. We base this opinion on three main reasons:

- **1: Speed differential.** The speed differential between pedestrians and footpath users and e-scooters is significant, and closer to (sometimes exceeding) that between bikes and pedestrians. E-scooters are allowed to be used on footpaths and the speed differential creates a hazard for both pedestrians and e-scooter users. OraTaiao has consistently called for footpath space to be given to pedestrians only¹², and until legislation is enforced that e-scooters cannot be used on footpaths, we cannot support their “ongoing declaration not to be motor vehicles”
- **2: Footpath space and storage.** An additional hazard is created by the random depositing of shared e-scooters on footpaths and within cycleways. This is a particularly important risk for disabled and blind pedestrians. Until such time as this is addressed by making footpath and cycleway parking of e-scooters illegal, and using road space to create corrals for e-scooter parking, we cannot support their “ongoing declaration not to be motor vehicles”
- **3: Lack of evidence for overall healthy transport mode shift.** Although e-scooters should give an additional option for mode shift away from unhealthy forms of transport such as private car use, there is at present no convincing evidence that this occurs. On the contrary, the evidence is that the mode-shift comes from healthier forms of transport than e-scooters, especially walking³. Suggestions that e-scooters would give a public health benefit by reducing physical inactivity cannot be accepted based on current evidence, and the counter-argument that they lower healthier forms of transport is more likely.

¹ OraTaiao Active Transportation Policy Statement (2021). Available at: https://www.orataiao.org.nz/orataiao_active_transportation_policy_statement

² OraTaiao submission guide on Accessible Streets package (2020). Available at: https://www.orataiao.org.nz/accessible_streets_package_of_rule_changes

³ Wang, K. Et al (2023) “What travel modes do shared e-scooters displace? A review of recent research findings”. *Transport Reviews*. 43(1): pp 5-31. Available at: <https://www.sciencedirect.com/org/science/article/pii/S0144164722004330>

OraTaiao strongly recommends that an extension to E-scooter (Declaration Not to be Motor Vehicles) Notice 2018 **not be provided** at the present time. We would support revisiting and reconsulting on this at such time as our above concerns are addressed through legislation, particularly points 1 & 2.

A handwritten signature in black ink, appearing to read 'COFFEY', with a stylized, looping flourish above it.

Dr Dermot Coffey

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About OraTaiao OraTaiao: The New Zealand Climate and Health Council is an organisation calling for urgent, fair, and Tiriti-based climate action in Aotearoa; we recognise the important co-benefits to health, well-being and fairness from strong and well-designed mitigative policies. Our vision is Āhuarangi Ora, Tangata Ora, 'Healthy Climate, Healthy People'

The logo for OraTaiao NZ Climate & Health Council. It features a stylized blue circular icon with a white swirl inside, followed by the text 'OraTaiao' in a large, blue, sans-serif font. Below this, the text 'NZ Climate & Health Council' is written in a smaller, grey, sans-serif font.