

THE ZERO-EMISSION VEHICLE STANDARD

ASSESSMENT OF THE RESULTS FOR

THE 2019-2021 COMPLIANCE PERIOD







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www.environnement.gouv.qc.ca/changementsclimatiques/vze/index-en.htm

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Context

In 2016, Québec adopted the Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions (ZEV Act). The attendant regulations came into force in January 2018. In addition to contributing to combating climate change, the zero-emission vehicle standard (ZEV standard) seeks to encourage the automobile market to develop more models that use increasingly efficient low-carbon technologies and lead to broader availability of such vehicles in Québec.

Since January 11, 2018, automakers that annually sell or lease 4 500 or more new vehicles in Québec have been subject to the ZEV standard. They must accumulate credits by providing zero-emission vehicles (ZEVs) or low-emission vehicles (LEVs)¹ on the Québec market. The government determines the credit target, which is calculated by applying a percentage to the total number of new light-duty vehicles that each automaker sells or leases in Québec. Accordingly, each vehicle sold or leased that the Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs (MELCCFP) recognizes gives the automaker credits, the number of which varies according to the type of vehicle and its electric range. The higher a vehicle's electric driving range, the greater the number of credits the automaker obtains. At the end of each compliance period, the automakers must have accumulated the number of credits corresponding to the requirements that the government set for that period.

This document reports on the results of the second compliance period related to the sale of vehicles for the 2019, 2020, and 2021 model years and in respect of which the automakers' reports were to be submitted to the government not later than September 1, 2022. This report takes stock of the credit registry to date, before and after the motor vehicle manufacturers met the credit requirements.

The credit requirements and the total credits that automotive manufacturers must accumulate to satisfy such requirements are calculated according to section 64 of the ZEV Act.

3

¹ Until now, all the vehicles credited as LEV pursuant to the Québec ZEV standard are plug-in hybrid electric vehicles (PHEV).

Assessment of the results of the 2019-2021 compliance period as of september 1, 2022

For this second compliance period, as was the case in the preceding period, all the motor vehicle manufacturers subject to the Act fulfilled their regulatory obligations whether by accumulating credits from the ZEVs and LEVs sold or leased or by acquiring credits from other manufacturers.

Requirements and accumulation of credits by automakers subject to the Act

To determine the requirements applicable to each of the motor vehicle manufacturers subject to the Act for the 2019, 2020, and 2021 model years, the MELCCFP used two methods:

- 1. The calculations stipulated in sections 13 and 14 of the implementing regulation (ZEV regulation), i.e., the average vehicle sales for the three previous model years, to which the MELCCFP applies the percentage of credits that the regulation requires (6.5% for 2019, 9.5% for 2020, and 12.0% for 2021), applicable to both large and intermediate volume manufacturers. In addition, starting in 2020, a proportion of the credits of large volume manufacturers only must come from the sale of ZEVs (credits stemming from the sale of LEVs are thus excluded), i.e., 6.0% of average sales for 2020 and 8.0% for 2021.
- 2. In 2020, because of the impact of the COVID-19 pandemic, four motor vehicle manufacturers took advantage of the calculation stipulated in section 19 of the implementing regulation whereby the percentages of the total credits (9.5%) and the ZEV credits (6.0%) are applied to vehicle sales in the year under way and not to average sales over three years. The motor vehicle manufacturers demonstrated to the Minister that total sales of new 2020 model year motor vehicles declined by at least 30% in relation to the preceding model year for reasons beyond their control and under unforeseen circumstances.

Table 1 presents the situation of motor vehicle manufacturers subject to the Act and their respective classification (size) and the situation of voluntary participants, which are not subject to the ZEV standard but nonetheless wish to participate in the credit trading market. For the 2019-2021 compliance period, 10 large volume manufacturers and four intermediate volume manufacturers were subject to the ZEV Act. Four small volume manufacturers participated voluntarily. Table 1 also takes stock of the credits recorded as of September 1, 2022, in the accounts of the motor vehicle manufacturers at the end of the 2019-2021 compliance period. The credits can have been accumulated either by selling or leasing eligible vehicles or by purchasing credits from other manufacturers.

At the end of the compliance period on September 1, 2022, a total of 224 008.18 credits had been accumulated for the 2019, 2020, and 2021 model years, as well as 46 572.59 excess credits stemming from the 2018 compliance period, which the automotive manufacturers could also use, subject to the 35% limit on the requirements applicable to previous credits. Table 2 takes stock of the excess credits of motor vehicle manufacturers for the first compliance period as of September 1, 2022, after they satisfied the requirements of this initial period.

Table 1: Categories of motor vehicle manufacturers and credits accumulated for the compliance period covering model years 2019 to 2021

Manufacturer		Number of credits accumulated (as of September 1, 2022)*						
		NZEV	RZEV	NLEV	RLEV	NVRE	RVRE	Total
	General Motors of Canada	33 795.00	90.33	662.70	7.93	-	-	34 555.96
	Ford Motor Company of Canada	11 193.02	3.14	3 373.51	0.45	-	-	14 570.12
	FCA Canada	13 000.00	-	1 029.60	1.83	-	-	14 031.43
ше	Honda Canada	10 000.00	-	1 321.08	-	-	-	11 321.08
Large volume	Hyundai Auto Canada	42 199.98	-	1 773.60	-	-	-	43 973.58
ge	Kia Canada	14 017.35	-	1 084.52	-	-	-	15 101.87
Lar	Mazda Canada	1 637.00	-	2 248.00	-	-	-	3 885.00
	Nissan Canada	12 352.26	254.30	-	-	-	-	12 606.56
	Toyota Canada	4 506.61	19.00	11 780.01	0.92	-	-	16 306.54
	Volkswagen Group Canada	9 748.36	-	81.42	-	-	-	9 829.78
ıte	BMW Canada	1 897.88	-	345.31	-	239.00	-	2 482.19
edia	Mercedes-Benz Canada	2 673.09	-	34.31	-	-	-	2 707.40
Intermediate volume	Subaru Canada	5 600.00	-	353.40	-	-	-	5 953.40
<u>ī</u>	Mitsubishi Motor Sales of Canada	-	-	1 754.40	14.79	-	-	1 769.19
пе	Jaguar Land Rover North America LLC	544.00	-	45.24	-	-	-	589.24
II O	Porsche Cars Canada	-	-	-	-	-	-	-
Small volume	Rivian Automotive, LLC	-	-	-	-	-	-	-
Sm	Tesla Motors Canada	34 324.84	-	-	-	-	-	34 324.84
	Total	197 489.39	366.77	25 887.10	25.92	239.00	-	224 008.18

Notes: The small volume manufacturers included on the list participated voluntarily in the acquisition and transaction of credits.

ZEV: zero-emission vehicle

LEV: low-emission vehicle

VRE: vehicle equipped with a range-extender

N: new R: re

R: reconditioned

^{*} The credits accumulated as of September 1, 2022, include those acquired from other motor vehicle manufacturers (transfer of credits).

Table 2: Categories of motor vehicle manufacturers and number of excess credits* accumulated for the first compliance period (2018 model year)

Manufacturer		Number of credits accumulated (as of September 1, 2022)**						
	- Wanufacturer		RZEV	NLEV	RLEV	NVRE	RVRE	Total
	General Motors of Canada	7 726.25	120.72	6 708.08	-	-	-	14 555.05
	Ford Motor Company of Canada	1 610.86	-	1.18	-	-	-	1 612.04
	FCA Canada	121.77	-	-	-	-	-	121.77
ne	Honda Canada	6 695.98	-	-	-	-	-	6 695.98
Large volume	Hyundai Auto Canada	0.23	-	-	-	-	-	0.23
gev	Kia Canada	1 819.55	-	-	-	-	-	1 819.55
Lar	Mazda Canada	1 200.00	-	941.58	-	-	-	2 141.58
	Nissan Canada	8 944.03	118.15	-	-	-	-	9 062.18
	Toyota Canada	3 125.39	10.00	699.57	-	-	-	3 834.96
	Volkswagen Group Canada	859.32	-	25.55	-	-	-	884.87
te	BMW Canada	489.27	-	-	-	391.53	-	880.80
Intermediate volume	Mercedes-Benz Canada	963.89	66.69	-	-	-	-	1 030.58
ermedia	Subaru Canada	1 660.29	-	-	-	-	-	1 660.29
<u>n</u>	Mitsubishi Motor Sales of Canada	325.74	2.36	1 789.28	-	-	-	2117.38
Small	Porsche Cars Canada	-	-	155.33	-	-	-	155.33
Small	Tesla Motors Canada	-	-	-	-	-	-	-
	Total	35 542.57	317.92	10 320.57	-	391.53	-	46 572.59

Notes: The small volume manufacturers included on the list participated voluntarily in the acquisition and transaction of credits.

ZEV: zero-emission vehicle

LEV: low-emission vehicle

REV: vehicle equipped with a range-extender

N: new

R: reconditioned

^{*} This table represents the banked credits once the motor vehicle manufacturers satisfied the requirements for the first compliance period in the fall of 2019.

^{**} The credits accumulated as of September 1, 2022, include those acquired from other motor vehicle manufacturers (transfer of credits).

Based on sales of light-duty vehicles reported by the motor vehicle manufacturers subject to the Act, the MELCCFP has established at 123 915.88 the total number of credits that the industry should accumulate to satisfy the requirements for the 2019-2021 compliance period (29 858.74 for model year 2019, 38 950.18 for model year 2020, and 55 106.96 for model year 2021). In the case of large volume manufacturers, 54 967.11 of the credits must come from ZEV sales, thus excluding credits stemming from LEV sales. Table 3 indicates the overall credit requirements and the requirements for each motor vehicle manufacturer.

When the credit requirements for the first two compliance periods are subtracted from the total credits accumulated for the two periods, a surplus of 147 956.89 credits² is available for the industry overall at the outset of the 2022-2024 compliance period, as Table 3 and Figure 1 show.

It is worth noting that, as was the case in the first compliance period, all the motor vehicle manufacturers subject to the Act fulfilled their regulatory obligations whether by accumulating credits from the electric vehicles sold or leased or by acquiring credits from other manufacturers.

² It should be noted that, unlike the other tables that exclusively indicate the results as of September 1, 2022, this surplus also includes the credits accumulated between September 1, 2022, and December 31, 2022, to present the most accurate picture of the motor vehicle manufacturers' excess credits at the outset of the 2022-2024 compliance period.

Table 3: Requirements respecting the credits be accumulated for the 2019-2021 compliance period and total excess credits

Manufacturer		Credits required for the 2019-2021 compliance period						Remaining		
		2019 (6.5%)	ZEV share (0%)	2020 (9.5%)	ZEV share (6%)	2021 (12%)	ZEV share (8%)	Total	ZEV share	credits [†]
	General Motors of Canada	3 179.61	-	5 026.86	3 174.86	6 833.20	4 555.47	15 039.67	7 730.33	34 071.34
	Ford Motor Company of Canada	3 291.77	-	4 998.27	3 156.80	6 034.00	4 022.67	14 324.04	7 179.47	1 858.12
	FCA Canada*	3 147.15	-	2 429.06	1 534.14	4 515.80	3 010.53	10 092.01	4 544.67	4 061.19
	Honda Canada	3 157.14	-	4 580.39	2 892.88	5 516.00	3 677.33	13 253.53	6 570.21	4 763.53
rge	Hyundai Auto Canada	2 790.30	-	4 562.00	2 881.26	5 427.68	3 618.45	12 779.98	6 499.71	31 193.83
[a	Kia Canada	1 603.90	-	2 416.83	1 526.42	2 794.80	1 863.20	6 815.53	3 389.62	10 105.89
	Mazda Canada*	1 784.16	-	1 241.65	784.20	2 990.24	1 993.49	6 016.05	2 777.69	2 260.53
	Nissan Canada*	2 625.46	-	2 714.82	1 714.62	4 949.36	3 299.57	10 289.64	5 014.19	11 379.10
	Toyota Canada	3 471.50	-	5 157.84	3 257.58	6 258.64	4 172.43	14 887.98	7 430.01	5 253.52
	Volkswagen Group Canada*	2 027.74	-	1 610.63	1 017.24	4 220.96	2 813.97	7 859.33	3 831.21	2 855.32
ate	BMW Canada	576.57	-	898.73	-	1 111.72	-	2 587.02	-	775.97
edi	Mercedes-Benz Canada	629.94	-	949.94	-	1 204.48	-	2 784.36	-	953.62
ermediate	Subaru Canada	1 056.64	-	1 548.09	-	2 202.88	-	4 807.61	-	2 806.08
重	Mitsubishi Motor Sales of Canada	516.86	-	815.07	-	1 047.20	-	2 379.13	-	1 507.44
	Jaguar Land Rover North America LLC	-	-	-	-	-	-	-	-	589.24
Small	Porsche Cars Canada	-	-	-	-	-	-	-	-	1 447.33
	Rivian Automotive, LLC	-	-	-	-	-	-	•	-	-
	Tesla Motors Canada	-	-	-	-	-	-	-	-	32 074.84
	Total	29 858.74	-	38 950.18	21 940.00	55 106.96	33 027.11	123 915.88	54 967.11	147 956.89

Notes: Small volume manufacturers are not subject to the ZEV standard and have no credit requirements to fulfill.

^{*} These motor vehicle manufacturers opted for the method based on the year under way to calculate the credits required for model year 2020, as stipulated in section 19 of the ZEV regulation.

⁺ The remaining credits represent the banked credits for the first two compliance periods once the credit requirements are satisfied. It should be noted that this column also includes the modifications (credit transfers and accumulations) conducted between September 1, 2022, and December 31, 2022, to represent as accurately as possible an overview of the motor vehicle manufacturers' excess credits at the outset of the 2022-2024 compliance period.

Transfer of credits between motor vehicle manufacturers

To comply with the standard, the motor vehicle manufacturers can obtain credits from manufacturers that have excess credits at their disposal. As of September 1, 2022, 22 transactions between 10 motor vehicle manufacturers had been conducted with respect to the 2019-2021 compliance period. Accordingly, 42 343.61 credits were transferred from one manufacturer to another (Table 4). It should be noted that this table also considers transactions related to the 2018 compliance period conducted after September 1, 2019, the date on which the first compliance period ended. However, it does not include the transactions related to the period 2022-2024, which will be reported when the results for this period are published.

Table 4: Transfers of credits between motor vehicle manufacturers, as of September 1, 2022

	Manufacturer	Category of credit	Number of credits
	General Motors of Canada	LEV	2 998.00
Manufacturers	General Wotors of Canada	ZEV	1637.00
transferring the credits	Hyundai Auto Canada	ZEV	1 650.00
o. cuito	Tesla Motors Canada	ZEV	36 058.61
	BMW Canada	ZEV	1 650.00
	FCA Canada	ZEV	13 000.00
24	Honda Canada	ZEV	10 000.00
Manufacturers receiving the	Mazda Canada	LEV	2 998.00
credits	iviazua Cariada	ZEV	1 637.00
0.03.10	Mercedes-Benz Canada	ZEV	3 100.00
	Subaru Canada	ZEV	5 600.00
	Toyota Canada	ZEV	4 358.61

In addition, Appendix 2 lists the credit transactions between motor vehicle manufacturers conducted between September 2, 2021, and September 1, 2022.

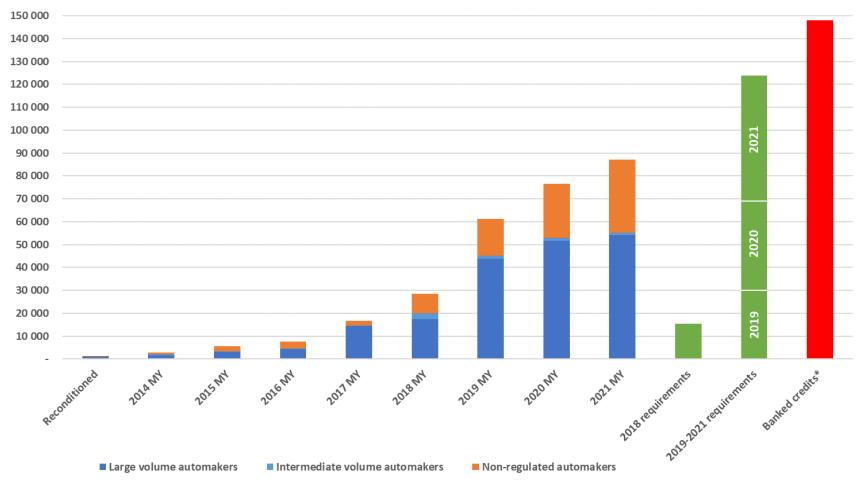
Credits accumulated according to the model year

Based on sales of light-duty vehicles reported by the motor vehicle manufacturers subject to the Act, the MELCCFP has established at 15 376.96 the total number of credits that the industry should accumulate to satisfy the requirements for the 2018 compliance period, as presented in its overview of the first compliance period and at 123 915.88 credits for the period 2019-2021.

The entire array of motor vehicle manufacturers subject to the Act satisfied the MELCCFP's requirements for each of the two first compliance periods. Indeed, in the wake of reporting on sales of new ZEVs, LEVs, and VREs for model years 2018 to 2021, the motor vehicle manufacturers

subject to the Act accumulated 173 129.69 credits. The total stands at 287 405.06 credits when the bonus credits granted for model years 2014 to 2017, reconditioned vehicles, and the contribution of small volume manufacturers are added. It is worth noting that the motor vehicle manufacturers subject to the Act that had insufficient credits to fulfil their individual requirements acquired credits from other motor vehicle manufacturers.

Figure 1 illustrates the breakdown of credits accumulated by the industry according to their source (manufacturers subject or not subject to the Act, reconditioned vehicles, bonus model years, and so on).



^{*} Banked excess credits of automakers once the 2018 and 2019-2021 credit requirements have been satisfied.

Figure 1: Accumulated credits and credit requirements for the first two compliance periods

Conclusion

As of January 26, 2023, there were nearly 172 000 electric vehicles on Québec roads. It should be noted that this assessment is confined to compliance with the requirements for the 2019-2021 compliance period and that it does not consider the credits granted for vehicles for model years 2022 and 2023 already on the roads. Such vehicles will be reported in the next compliance period.

The adoption of the ZEV standard has played a significant role in enhancing electric vehicle offerings in recent years. The government's clear determination, given concrete expression through legislative tools, has enabled motor vehicle manufacturers to prioritize the Québec market to sell certain models of vehicles, increase the number of ZEVs offered to consumers, and the availability of a variety of models, even though waiting times to obtain the vehicles are sometimes lengthy, especially because of global supply problems. Thanks to the measures put in place, 42% of EVs in the Canadian fleet are registered in Québec. In addition, data published by Statistics Canada showed an 11.8% share of new vehicles registered as EVs in Quebec between January 1 and September 30, 2022, compared to 6.0% in Ontario and 7.7% for Canada as a whole³.

As was the case in the first compliance period, all the automakers subject to the Act complied with the requirements respecting model years 2019 to 2021. However, the 287 405.06 credits that the industry accumulated represent more than twice the credits required for the first two compliance periods, leaving roughly 148 000 excess credits to be used to partly satisfy the requirements of forthcoming periods. In light of current trends, the excess credits bank might even triple by 2025.

Indeed, the automotive industry has surpassed the requirements. Credit requirements for the period 2018-2021 represented between 75 000 and 80 000 EVs when the average number of credits per EV sold are used. Moreover, the 2014-2017 bonus credits and, to a lesser extent, the credits granted for reconditioned vehicles, were equivalent to roughly 12 500 EVs that could be exempted from this requirement. However, 146 000 vehicles have been registered since the standard came into force in January 2018. It is good news, but it confirms that the industry can surpass the current requirements.

This observation and indications that demand still exceeds supply for certain models of vehicles, which occasionally leads to very lengthy waiting lists, have raised the question of a potential tightening of the ZEV standard and an increase in the credit requirements.

In this context, to attain its electrification targets in the light duty transport sector, in 2022 the government initiated a regulatory amendment process to tighten the requirements of the ZEV standard. The adoption of new tightened regulation is slated for 2023, to come into force for model year 2025. In particular, it seeks to attain the target of 100% electric vehicle sales in 2035, at which time the sale of new gasoline-powered vehicles will be prohibited, as stipulated in <u>The 2030 Plan for a Green Economy</u> and in accordance with the government's commitment made

³ Statistics Canada, *New motor vehicle registrations: Quarterly data visualization tool*, 2023, https://www150.statcan.gc.ca/n1/pub/71-607-x/71-607-x2021019-eng.htm

through the Act mainly to reinforce the enforcement of environmental and dam safety legislation, to ensure the responsible management of pesticides and to implement certain measures of the 2030 Plan for a Green Economy concerning zero emission vehicles.

Abbreviations acronyms and initialisms

- **ZEV Act:** Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions
- MELCCFP: Ministère de l'Environnement, de la Lutte contre les changements climatiques, de la Faune et des Parcs
- ZEV standard: zero-emission vehicle standard
- **ZEV regulation:** Regulation respecting the application of the Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions
- LEV: low-emission vehicles, including rechargeable hybrid vehicles and vehicles equipped with a range extender
- VRE: vehicles equipped with a range extender, as stipulated in the parameters of the ZEV regulation (the electric range must exceed the range of fuel-powered vehicles)
- ZEV: Zero-emission vehicles, including all-electric vehicles and fuel cell vehicles

References

- The zero-emission vehicle (ZEV) standard
 www.environnement.gouv.qc.ca/changementsclimatiques/vze/index-en.htm
- The Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions https://www.legisquebec.gouv.qc.ca/en/document/cs/A-33.02
- The Regulation respecting the application of the Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions https://www.legisquebec.gouv.qc.ca/en/document/cr/A-33.02,%20r.%201
- The Regulation respecting the limit on the number of credits that may be used by a motor vehicle manufacturer and the confidentiality of some information https://www.legisquebec.gouv.qc.ca/en/document/cr/A-33.02,%20r.%202
- List of new or reconditioned motor vehicles eligible for credits
 www.environnement.gouv.qc.ca/changementsclimatiques/vze/liste-vehicules-admis-en.htm
- The 2030 Plan for a Green Economy
 https://www.quebec.ca/en/government/policies-orientations/plan-green-economy

- Norme véhicules zéro émission (norme VZE) Bilan des résultats de la première période de conformité
 environnement.gouv.qc.ca/changementsclimatiques/vze/bilan-norme-vze-periode-1-en.pdf
- The Act to increase the number of zero-emission motor vehicles in Québec in order to reduce greenhouse gas and other pollutant emissions 2018-2020 Implementation Report environnement.gouv.qc.ca/changementsclimatiques/vze/rapport-mise-oeuvre-2018-2020-en.pdf

Appendix 1: Compliance periods and credit requirements

What is a compliance period?

A compliance period is a period during which automakers must satisfy the regulatory obligations linked to predetermined vehicle model years. For each period, a deadline is set for reporting (as a number of credits due) to the government. The date is September 1 of the calendar year following the end of the period.

Three-year compliance periods came into effect starting in model year 2019. Accordingly, at the conclusion of the 2019-2021 compliance period on September 1, 2022, automakers must have reported all sales of ZEVs and LEVs for model years 2019, 2020, and 2021 to accumulate the requisite credits to fulfil their obligations for the three years (Figure 2). It is worth noting that the requisite number of credits corresponds to the percentages indicated below applied to all light-duty vehicles sold and/or leased by model year for each manufacturer.

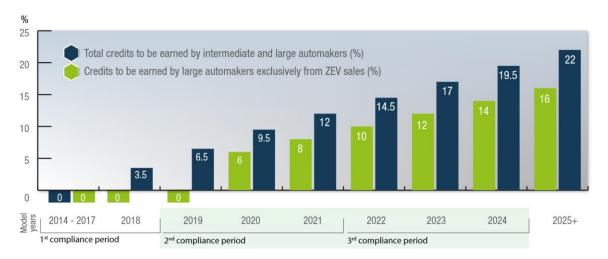


Figure 2: Annual credit requirements and illustration of compliance periods

The first compliance period pertaining to the first year of application of the ZEV Act covered model year 2018 vehicles sold in Québec. It called for accountability on September 1, 2019, with the credits accumulated for model year 2014 to 2018 vehicles. The 2014 to 2017 model years were deemed "bonuses." Our website presents an <u>overview</u> of this period.

Zero-emission vehicle credits have been mandatory since 2020

Large volume manufacturers have been obliged since model year 2020 to accumulate a percentage of credits attributable solely to ZEV sales. Credits linked to the sale of rechargeable hybrid vehicles cannot, therefore, satisfy this requirement. Indeed, the minimum requirement governing the credits that motor vehicle manufacturers subject to the Act must accumulate is, for model year 2020 as an example, 9.5%, of which 6% must come solely from ZEV sales in the case of large volume manufacturers (Figure 2). Québec's requirements thus echo those in force in California.

To obtain additional information on the application of the ZEV standard as regards vehicles eligible for credits, credit calculation forms for each vehicle sold, the classification of automakers, requirements, and so, please consult the <u>explanatory leaflet</u> and the resources available on pages 14 and 15.

Appendix 2: Transfers of credits over the past year

To round out the information presented in the previously published assessments of the credit registry as of <u>September 1, 2020</u> and <u>September 1, 2021</u>, below are the credit transactions between motor vehicle manufacturers conducted between September 2, 2021 and September 1, 2022.

Table 5: Transfers between September 2, 2021 and September 1, 2022, of credits between motor vehicle manufacturers

	Manufacturer	Category of credit	Accumulation period	Number of credits
	General Motors of Canada	NLEV	2019-2021	398.00
Ceding		NZEV	2019-2021	1 637.00
manu-	Hyundai Auto Canada	NZEV	2014-2018	327.00
facturer	nyunuai Auto Canada	INZEV	2019-2021	1 323.00
	Tesla Motors Canada	NZEV	2022-2024	5 100.00
	BMW Canada	NZEV	2014-2018	327.00
Dunan	BIVIVV Canada	INZEV	2019-2021	1 323.00
Buyer	Mazda Canada	NLEV	2019-2021	398.00
	ividzud Calidud	NZEV	2019-2021	1 637.00
	Toyota Canada	NZEV	2022-2024	5 100.00



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