

# Fuel Efficiency Standard (2023) Australia

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## Notes taken from Catherine King & Chris Bowen Notes highlighted here:

Fuel Efficiency Standards for Australia, and Russia somehow, possibly impact 14% or less globally.

(My comment: Australia's impact is solely what counts here).

Australia's near 100% imports of vehicles are dependent on overseas manufacturer standards.

(My comment: currently regardless).

## Fuel efficiency standards

- 1) *"provide an incentive to vehicle suppliers."*
- 2) *"help(s) to increase supply of efficient vehicles."*
- 3) *"enables manufacturers to charge lower prices to Australian new car buyers."*
- 4) *"expect to continue to access the same type of vehicles."*
- 5) *"also get the choice of more efficient petrol & diesel engines, more hybrids, plug-in hybrids and battery EV options ..."*
- 6) *"deliver more advanced and affordable vehicles into Australia, ..."*
- 7) *"will drive down emissions."*

Apparently:

*"On average, passenger cars in Australia emit 40% more carbon than the European Union, 20% more than the US and 15% more than New Zealand".*

(My comment: I strongly doubt such claim anywhere near true).

Tasks:

- 1) *"... design(ing) a fuel efficiency standard" (that works)*
- 2) *"... design a strong standard that is right for Australia."*

Key design questions: Attachment A (electronic page 32+)

## **FES - Principles and design assumptions**

Taking reference from Europe (includes UK) makes policy prone to Australian inefficiencies. European policies are purely developed to suit, and have proven – in Court - to feed European economy.

Australian operating vehicles, but esp. regional (car, motorcycle) vehicles – given distances between possible services available – should be reliable and have comfortable range (incl. return trip).

Such technical requirement delivers Australia (and others alike) potent reasons to have all vehicles, at least in part but preferably in whole:

- Developed and made (or assembled) locally.
- Fully technically reviewed for integrity; necessarily meeting local safety and environmental needs (controlled by Australia Standards independently).

Australia should audit any 'overseas produce or good c/w specified content data detail needs, incl. material origin(s), recycle (cap)abilities, safety, and ethical emissions data reports.

This to increase:

- Honesty relating to any overseas product data.
- Ethical emission accountabilities.
- Reductions in required 'shipping' emissions.
- Citizen's realization to honestly believe urgent 'emission reduction needs' messages which are not acknowledged yet by some due to contradictory international policies (e.g.: COP26 organized firstly to cut *more* timber).
- Empowerment of citizens to replace so-called 'cleaner' technologies appropriately, reliably developed, audited, and made (or assembled) locally.
- Delivery through local Standards that will serve and meet local needs.
- Delivery of more related local employment opportunities.
- Australia's effectiveness reaching their emission reduction targets. Not side tracked by unethical colonizer 'experts'.
- Australia's full sovereign independence.

Shipping vast quantities of 'vehicle compartment air' makes no ethical sense, esp. over vast distances.

It defeats purpose: to purchase an overseas supposedly 'greener' vehicle when product development emissions are actually worse upfront overall (incl. mineral transports) which are intentionally not reported yet.

Esp. when related European vehicle emissions advertised data contain intentionally manufactured untruths and some vehicles proven even unsafe.

An European vehicle 'test track' does not possibly reflect Australian road conditions equally (manufactured misrepresentation of 'Australian made' car fuel emissions are my experience).

Additionally, to any imported produce or good; Australia should attain and add all applicable 'shipping' emissions from its origin(s). E.g.: supposedly 'Spanish' olives; some are train imported from China to be exported again.

Realities present why some citizens do not believe in the 'overseas emission reduction need hype', loudly internationally politically posed.

## **Are the exclusions for military, law enforcement, emergency services, agricultural equipment and motorcycles the right ones?**

Military, law enforcement, and emergency vehicles must be capable to provide reliable services at any possible time.

Until related technologies are proven fully reliable at all possible times – necessarily incl. military additional risks & safety reviews - this category should be 'part excluded' at least.

Motorcycles generally consume already halve fuel consumption of cars.  
Motorcycle companies report similar developments in progress as cars.

Agricultural and Mining vehicles could seemingly be included to meet FES due to specific operational 'distance limits' generally.

## **FES design features**

### **What principles should we consider when setting targets?**

If anything: COVID pandemic has shown 'independent production capabilities' are a 'political and strategic must'.

Independence also proves 'emissions-wise' most ethical in many ways.  
Standards should only allow honest quality approved products to be possibly imported.

A general tax holds generally the average but esp. poor citizens down for longer.

There are no real alternatives available yet inside Australia – all *dependently* "must come from overseas". Exactly where international emission policy developers reside.

Australia's Standards and responsibilities are 'not' for any others (overseas).  
Australian Standards should purely serve and suit Australian conditions best.

Importance of independence - self-control – makes Australia price-setters instead of enslaved price-takers.

Any Australian FES should consider regional conditions: needing comfortable long-distance vehicles, have lower incomes (if any), confront higher prices, have no public transport available, and any services offered are limited increasing long-distance travel needs.

Least of Australia is urbanized.

Most cars are urbanized which presents that 'current public transport utilization policies inside cities' are a political costly economic and emission reduction failure.  
Any FES's focus should first mainly be where public transport services are widely in operation already.

Cars (esp. SUV, 4WDs) are mostly not 'really needed' in cities.  
(Cheaper) fuel efficient vehicle rental options can provide possibly needed flexibilities.

However, State registration 'income' would then decline, explaining economically 'why not' likely implemented.

Supporting (again) that citizens remain unconvinced regarding FES 'hype'.  
(Note: I do stand for 'continuous improvements' where ethical possible.)

## **Starting emissions level limit and approach**

### **What should Australia' CO2 FES target be?**

Any "must align" suggestion (e.g.: 95 g CO<sub>2</sub>/km for cars) would make regional transport rather uncomfortable, likely more unreliable, or very expensive, and therefore not appropriate for countries like Australia at large.

One cannot respectfully suggest to utilize 'geographical European policies alike' within countries like Australia. One would compare apples with rocks.

### **How many years ahead should government set emission targets?**

Longer timeframes make less sense and are less efficient because more unnecessarily large (esp. unnecessary SUV and 4WD city ownerships) emitting vehicles will pollute for longer.

Efficiencies present best when 'tackled' upfront. E.g.: Engineering particular project specifications, standards etc. must be perfect prior serious project commencements or very costly inefficiencies will present.

Policy details and implementation procedures are no different needing upfront locally suitable policy developments instead of being led, remaining dependent, and thereby will be detrimentally controlled by overseas political inputs.

'Overseas political controls' cannot honestly be a 'respectful position' for most 'liberated' citizens to simply accept.

It depends on the duration it would take to implement desired outcomes appropriately, compliant to independent Australian Standards (most) effectively, necessarily respecting Australia's various conditions.

## **Attribute based emission limits**

### **Should an Australian FES adopt a mass-based or foot-print based limit curve?**

If (international) politics wishes to become serious: then 'personal citizen emission count' targets (incl. wasteful consumptions) and limits should apply regardless of wealth.

That can only be achieved through an individual "footprint-based" ethical accounting method. It would need to be honestly monitored, also electronically on vehicles and such monitor device yearly audited with appropriate accountabilities attached.

Any "mass-based" idea will:

- Feed large market-share companies and any wealth only more.
- Continue to place emission controls with overseas wealthy companies.

Thereby mainly:

- Produce fewer 'respectfully constructive developments' (as all would need vehicle replacements later again.  
Like constantly unnecessarily 'computer technology updates' are allowed to drive more waste faster, purely for vast profits (overseas).
- Prevent ethical improvements.

Exclusive (vehicle) companies are exclusive regardless for several similar influential 'disrespectful' reasons.

Pure individual "footprint-based" principles will motivate each individual (country) respectfully.

Only 'honest individual accountabilities' (also per country) lands apparent 'emission reduction needs' best; by convincing - *motivating* local citizens.

### **Should an Australian FES adopt two emissions targets for different classes of vehicles?**

Only vehicles that operate in or near cities, agricultural, and mining could possibly be requested to meet emission reduction targets because there has not been much support for regional infrastructure.

I refer to durations taken to organize a few urgently needed truck / vehicle stops. Those few built; some are still without amenities.

Therefore: all honest 'regional related transport', '200 km plus' radius clear from any city centre, cannot possibly be 'targeted' yet, other than agricultural or mining vehicles.

### **Are there other policy interventions that might encourage more efficient vehicle choices?**

- 1) If efficiency is really desired then do not copy any European policies: they solely suit Europe and not much else.
- 2) "Fuel Efficiency Standards" without '*an honest emissions (ac)counting system*' defies purpose. Therefore, make, esp. international, emission accounting honest and accountable for all 'produce'.
- 3) Promote and support self-motivation for best incentive.
- 4) Any vehicle's (and 'any other imported good') emission should include all actual transport emissions needed to transport any produce into Australia.  
Supporting:
  - a) Local assembly and manufacturing.
  - b) Lower emissions per vehicle manufacturing.
  - c) Compliant vehicle deliveries to Australians.
- 5) Independent Australian developed Emission Standards should drive honest whole product cycle 'emission accountabilities' and would force importers to produce compliantly to Australian demands instead of being led and controlled by overseas politics proven economically detrimental.  
Thereby at least:
  - a) Improving vehicle shipping efficiencies forcing vehicle manufacturing and or assembly locally.
  - b) Reducing shipping movements globally.
  - c) Reducing illegal shipping oil etc. 'illegal dump' pollutions in Australian Seas.
  - d) Reducing internationally associated shipping risks. (Are shipping emissions added anywhere appropriately?)
  - e) Supporting World's first ethical honestly reflective who 'burns or buys what and how much from where; a *foot-print-based limit curve*, internationally.

- 6) For as long as emissions counting systems are fraudulently (incorrectly) applied internationally; many citizens will not support 'unethical emission counts' developed purposely overseas. It is ethically necessary to reflect honestly each pollution influence inside the entire world economy (Noting: colonization means 'governing others').  
A ship registered in non-HQ overseas country locates transport emissions and pollution risks and associated liabilities in another (poor) country. Although it is HQ that only directs.  
Therefore, HQ should actually made to own all company liabilities. That would finally place any emission and liability inside a product's actual 'HQ citizenship'.
- 7) Emissions data should be honestly available to each potential customer.

The proposals above are necessary to bring:

- Honesty reporting (relates to justice) into 'international politics', incl. vehicles related manufacturing emissions data.
- Accountabilities where they belong: solely where HQ direction orders are given. Necessary to place authority and ownership directly with CEOs, board members, and applicable managers for 'full legal professional liability reach' equally, and hopefully proportionally to salary, or whatever asset, or benefit(s) accumulated.

The best motivators to meet targets (agreed within) are:

- Independence
- Team work within (borders)
- Ethics
- Freedom

Best to have own independent ethical standards, specifications, systems, and capabilities in place first that also any other must meet prior any Australian import approval.

### **Voluntary based FES:**

#### **To incentivize Australians 'voluntarily' by:**

- 1) Developing honest total vehicle 'manufacturing emission' counts; then more cars would be made or assembled here (opportunities & empowerment for social progress here instead of overseas).  
(There is a need to end 'EU washing machine unequal testing' issued star ratings, and proven European manufactured vehicle emission lies).
- 2) Developing lesser emitting Australian 'locally made' vehicles.
- 3) Developing (improved new technology) public transport availabilities, because esp. long-distance regional connections are not respectfully applicable yet (Federal focus sadly remains on Sydney, Melbourne, Brisbane).
- 4) Possibly, in future, develop an emission recording device (attachment) to existing 'die-hard worse-for-pollution' vehicles with amended registration conditions, appropriately administered and audited by authorized mechanic instead of another tax.
- 5) Increasing SUV and 4WD registration costs massively when less-purposeful (unless farmer etc.), esp. for city residents. Make 4WD vehicle rentals more available (if demand thereby develops).

## 7. Credits – flexibility mechanisms

Best to stick with principles specified, without flexibilities which are likely to suit non-compliance after all.

Credits is such flexibility mechanism that allows FES inefficiencies.

Allowing any 'principal flexibility mechanism' means:

- Administrating those flexibilities.
- Risking rorts mainly by those influential.
- The Standard collapses because principal specifications no longer need to be fully adhered similarly by all.

'Multipliers' only possible purpose is to present 'emitting realities' dishonestly, unequally, and disrespectfully and destroys equal, honest (fair) competition.

Who could possibly think 'multipliers' honestly effective?

Multipliers create deception opportunities to some.

### When do you think a FES should start?

For Australia, esp. all regionals, FES should only possibly start once:

- Local necessary supporting infrastructures are abundantly in operation (esp. capable capturing regional distances well).
- Proven ethical (recyclable) technologies exist here in Australia – preferably fully developed, made, and company HQ owned in Australia.
- Citizens have become *convinced* targets and Australian policies are ethically effective and locally feasible within.

To start FES earlier wouldn't it simply depend, rely, and follow 'another overseas' whom has proven inefficient? Keeping Australian industries under foreign controlled protocols (again); limiting opportunities in Australia.

Reliable supporting infrastructure for electric or hydrogen vehicles should also be sufficiently available prior regional FES targets could be mandated there.

### Should the government provide incentives for the supply of EVs ahead of a FES commencing? If so, how?

Why possibly wait for overseas car suppliers to act, or even offering possibly an 'incentive' overseas?

Suggest strongly to invest in and develop Australia's own *independent* low-emitting vehicle manufacturing and any necessary infrastructure support industry – readied for possible vehicle exports delivering '*pollution reduction efforts*' competition, needed here.

The incentive is for Australia and its citizens to limit their pollution overall. That responsibility cannot possibly rest overseas.

What overseas vehicle manufacturers deliver will currently – regardless of an Australian incentive - not ever depend on an Australia FES Standard because:

- 1) Australia is under '*European rule*' still, and
- 2) For them "*Australia is not a big market*".

## 9. Penalties

How could any penalty possibly work effectively 'for Australia' when all vehicles are now imported and controlled overseas? The Australian emission penalty would simply be included in the overseas manufactured vehicle price destined for Australia.

Any such 'less-compliant Australian Standards penalized vehicle' related shipment emissions would be charged against whom?

What about 'foreign vehicle emission' proven data fraud?

Currently all Australian vehicle emission efforts seem wasted to finance overseas jobs and their opportunities.

It is (again) strongly suggested to become more independent and leave inefficient colonizing influences behind.

## 10. Concessional arrangements

Any 'emission concession' is similar to a credit, or subsidy. All seem costly administrative complexities which only offer or even promote non-compliance, distortions of realities amongst political protocols solely to implement inequality.

Any vehicle 'fuel emission standard' pollution reduction target should promote 'policy honesty' if to *motivate* citizens instead of non-accountable bias simple 'desktop data manipulations' currently seemingly applied internationally.

Financial subsidies are bureaucratic political (ideological bias) tools, therefore likely costly, inefficient, and present, as usual with any 'administrative tax', more by-pass opportunities to the wealthy.

Why even possibly suggest 'any concession' for any importer into Australia?  
It could not possibly serve Australia in a respectful manner.

## 11 Administration

The Department of Industry, Science, and Resources would seem best capable to monitor, administer, and make appropriate recommendations towards FES.

There should not be any 'foreign influence' amongst Australia's 'political advisors'; to prevent colonizer bias and fraudulent related activities.

This topic will relate to multi-billion-dollar industries.

## 12. Testing

Quality control, safety and material compliance checks, and any testing should only involve recognized *authorities* regularly independently audited, involving *Australian* citizens *only* regarding any imported good or produce into Australia.

World harmonised testing procedures do not apply actually.

Overseas testing reports have proven, and remain therefore unreliable for Australia.