Land Transport Policy Branch
Department of Infrastructure, Transport, Regional
Development, Communications & the Arts
GPO Box 594
CANBERRA ACT 2601



Via email: freightstrategyreview@infrastructure.gov.au

28 September 2023

Dear Review team,

Re: Submission to the Review of the National Freight & Supply Chain Strategy

I am pleased to attach MOV3MENT's submission into the review of the National Freight and Supply Chain Strategy (the Strategy) and I thank you for the opportunity to participate in this important process.

MOV3MENT is the only independent consultancy dedicated to decarbonising freight and transport in Australia. We believe that driving emissions to net zero objectively represents the greatest threat – and opportunity – to Australia's freight system.

Since the inception of the original Strategy, decarbonisation has been a glaring omission. Climate change, emissions reduction, and achieving net zero present enormous challenges to Australia's supply chains. Given the importance of freight in underpinning Australia's prosperity and living standards, a strategy that does not address these challenges is no plan at all. I therefore commend the Department for explicitly seeking feedback on this critical issue.

Our submission reflects nearly two decades of experience and leadership in decarbonising the Australian truck, bus, car, and rail fleets – at both a policy level and at the coalface working directly with vehicle manufacturers and fleet managers. With that foundation, the submission focusses on what the Australian freight sector is missing (barriers and enablers) to shift to lower-emission supply chains. It highlights four critical initiatives that address these factors and align with the Strategy's goals and objectives:

- Better baseline data on transport energy use
- Defining clear duty cycles for freight operations
- Delivering on a Truck Star Rating
- Supporting a Green Freight Program.

I would welcome the opportunity to discuss any aspect of our submission as the Review progresses. I would also welcome the opportunity to advise the Department in any capacity as the new strategy is developed and implemented.

Yours sincerely,



Mark Gjerek



Submission:

Review of the National Freight & Supply Chain Strategy



Department of Infrastructure, Transport, Regional Development, Communications & the Arts

Land Transport Policy Branch



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Is the Strategy fit for purpose?

Q1. Do the Strategy's current goals support the needs of the freight and supply chain sector?

No. The Strategy's current goals overlook the seismic disruption already facing Australia's freight industry, stemming from the need to reduce carbon emissions. The Strategy does not currently address the need to lower freight's carbon contribution under Australia's international climate commitments or provide a viable pathway for operators to thrive in a decarbonising supply chain. The shift to cleaner technologies and fuels is already locked-in but industry is not ready for the disruption to current practices and productivity.

Q2. Should other goals be included in the Strategy, and if so, what?

Yes – decarbonisation of freight and emissions reduction across the supply chain should be made an explicit standalone goal of the Strategy going forward. The goal should align with Australia's emissions reduction commitments, with scope for more granular sectoral targets for the freight industry.

This approach could be supported with actions and targets to accelerate adoption of cleaner technologies at lower costs for operators (as done overseas), and actions to improve the knowledge and skills required to support these technologies. While technology and skills are potentially covered by Goal 4 'innovation' and Goal 5 'skilled/adaptable workforce', they are not explicit or specific enough at the moment.

Background context

Decarbonisation has long been the **missing piece of the puzzle** in the National Freight and Supply Chain Strategy (the Strategy). While the existing goals do reference 'sustainability', this is clearly not interpreted as *environmental* sustainability and the Strategy is otherwise silent on emissions reductions. This is a concerning oversight for at least two major reasons:

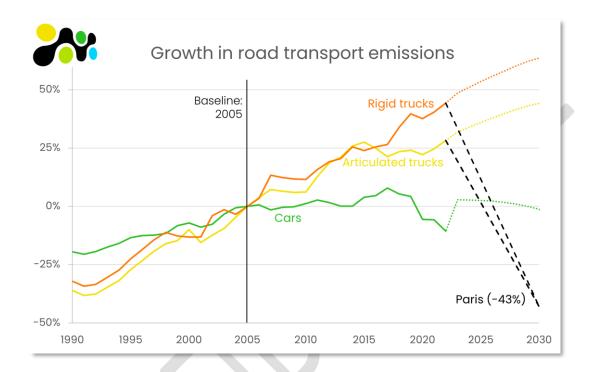
- 1. The freight transport sector is integral to reducing economy-wide emissions and fulfilling Australia's national and international commitments. Neither the 2030 interim target nor the 2050 net zero target are achievable without dramatic and substantive cuts in emissions from freight and logistics.
- 2. An unmanaged transition to 2030 represents an economic risk to Australia's freight sector and the strength of its supply chains as it is likely to lead to delayed, disorderly, and inefficient decarbonisation.

Australia's struggle to rein in freight emissions is taking place against a backdrop of ever greater freight volumes. As the Strategy itself notes, Australia's freight task is expected to increase by 26% by 2050.

The combined effect of all policies has <u>not achieved any improvement in energy intensity or productivity</u> in this sector for nearly a decade, and aggregate <u>emissions from the truck fleet continue to increase</u>, not decrease. Without a coordinated effort to shift to lower-carbon energy sources, the same old policy focus will simply result in more of the same outcomes. <u>Decarbonisation needs to be a goal across all freight-related strategies</u> including this one, not seen as just something for new trucks.



While Australia's freight transport sector contributes **only 7% of national emissions, this is expected to grow dramatically**. Most other sectors are achieving substantial cuts and the declines in electricity emissions alone will see freight emissions rise steeply both in real terms and as a share of national emissions. As our analysis of <u>national greenhouse gas projections</u> shows below, growth in emissions from passenger transport may be plateauing but emissions from trucks continued to accelerate through the pandemic and are only **projected to rise further in the years ahead.**



Put simply, the sector must reverse its emissions trajectory within this 'decisive decade' before 2030, even as the freight task continues to expand. This may represent the single biggest disruption to Australia's freight system since the advent of internal combustion engines over 100 years ago. There is no national plan for how to do this. So, the updated Strategy presents a unique opportunity to guide this transition in a responsible, effective "joined up" approach as noted in the Discussion Paper: coordinated with, not separate to, other policy areas.

Within individual supply chains, there is significant uncertainty as to the best alternative energy pathway to pursue. All options currently add costs compared with diesel, but the transition will have differential risks and impacts. The largest transport fleets face the pressure of a tightening Safeguard Mechanism, but also have access to the finance necessary to invest in clean energy. However, <u>approximately 98%</u> of truck operators are small/medium businesses; 70% own just one truck. These owner-operators have limited ability to finance the transition to low-emission freight. For many, this becomes a future existential threat.

Even without government pressure, the freight sector can no longer resist calls for rapid decarbonisation from higher up the supply chain. <u>Two-thirds of ASX200 companies</u> now have some form of emissions reductions targets in place with roughly half committed to net zero. As the 'low-hanging fruit' of Scope 1 and Scope 2 emissions are addressed, **Scope 3 emissions related to logistics are increasingly the focus for corporate decarbonisation**. Again, most micro businesses that subcontract in the supply chain have no plan (or capacity) to tackle this challenge.



Priorities for the next five-year National Action Plan

Q3. Should the National Action Plan focus on a smaller number of targeted national actions, or do you want to retain the existing reporting structure?

Retaining the existing reporting structure will help ensure accountability for freight decarbonisation through consistent, ongoing reporting on emissions reduction. In turn, this will enable improved progress monitoring on the emissions intensity of Australia's supply chains.

Q4. If we focus on a smaller number of targeted national actions, what action areas should be included in the National Action Plan that require national coordination?

Decarbonising Australian freight must be included in the next National Action Plan to achieve nationally coordinated outcomes, irrespective of any consolidation taken across other action areas. A dedicated 'Priority 5: Freight Decarbonisation' could include the following targeted national actions:

- Quantitativley define key Australian truck applications or freight tasks based on energy data and standardised operating profiles (either through the National Freight Data Hub or separately)
- Progress a scheme for comparative emissions ratings for freight vehicles with an early focus on key truck applications (e.g. the 'Smart Truck Rating' that was included in the previous Action Plan)
- Support the creation of a dedicated Green Freight Program for Australia, combining operational resources and guidance material with government and industry co-investment in low-emission demonstration projects"

An additional targeted action could be included in 'Priority 4: Better freight location & performance data'.

 Develop a better evidence-base of how energy is used across freight tasks and supply chains to drive improved decision-making, investment, and operations. This is particularly important in supporting uptake of low/zero-emission technologies and alternative transport fuels.

Background context

This is the "decisive decade" for limiting global temperature rise to 1.5°C, so the next 5-year National Action Plan (NAP) will be the only NAP that can meaningfully contribute to the Australian Government's commitment to reduce economy-wide emissions by 43% in 2030.

The significance and urgency of freight decarbonisation warrants a standalone reporting metric as Priority #5. As per other NAP priorities, annual reports would detail explicit actions and/or projects being undertaken to decarbonise the sector that are reflected in jurisdictions' implementation plans and annual progress reports. Retaining the existing reporting structure will therefore improve accountability on decarbonisation efforts and help keep freight emissions reduction on track.

The potential list of actions to be included under a new decarbonisation priority is long and manifold. While the Strategy and NAP cannot shoulder this responsibility alone, it is uniquely placed and timed to address the connection between barriers (and enablers) currently constraining low emissions technology and practices in the freight and supply chain sector. As the only policy/strategy linking all stakeholders (operators, customers, suppliers), all locations, and all freight agencies, **it must play some role**.



By far the most limiting of these factors is the absence of good foundation data and information that could otherwise help simplify the decarbonisation process - and it is always a process, not just a new product. While information alone will not fix all issues, critical market failures mean that even the simplest questions cannot be answered by fleets, customers, suppliers and policymakers to drive change, such as:

- How many trucks are used in different applications/end-uses/missions/duty-cycles (e.g. long-haul, urban distribution, waste, etc)? Registration and fleet sales not tracked in that way: no data.
- What proportion of energy is used by these applications (to target actions)? **No data**.
- How are these applications quantitatively defined (e.g. speed, stops, etc)? No Australian data.
- Which truck is more fuel efficient: Model A or B? No standard comparative test/indicator/data.

These gaps constrain effective decision making. We suggest 4 foundations to help address the gaps.

- 1. Data is essential to improving Australia's freight system and this is no different for the shift to decarbonised supply chains. While there are actions underway and progress made in capturing both goods-related and position-related freight data, there is currently a dearth of energy-related data. Yet energy is the critical determinant in the shift to cleaner vehicles. The next NAP should therefore embed a comprehensive program of data baselining to support freight transport's energy transition. This could sit within either Priority 4 or 5 but will need to build a detailed picture of how and where energy is used by different vehicle types and truck applications. MOV3MENT has worked extensively on this issue: more information can be provided on request.
- 2. Quantitative definitions of duty cycles for Australia's truck fleet are required, particularly in the road freight sector. The choice between different low-emission transport options (e.g. renewable diesel versus hydrogen fuel cells versus battery-electric) is ultimately determined by the energy demands of the specific freight task. Without defined energy profiles, identifying low-emission alternatives is a guessing game. Facilitating investment in optimal, lowest-cost abatement options is therefore contingent on clearly categorised duty cycles defined by energy use. MOV3MENT has also worked extensively in this area and influenced the approach taken by state government transport agencies and vehicle suppliers alike towards adopting this approach. We have foundation work to share and industry support to seek funding to progress this action.
- 3. Truck buyers need to, but can't, compare truck efficiency and emissions. Passenger vehicles already have fuel efficiency and CO₂ labels to inform consumer choice, but this is not the case for freight operators buying heavy vehicles. There is currently no comparative rating or indicator to guide purchase decisions on trucks. Many other sectors from buildings to appliances to foods and restaurants use the simple concept of star ratings to guide purchasing decisions toward energy/emissions preferable products¹. MOV3MENT was instrumental in developing a world-first 'Smart Truck Rating' in 2020 with a demonstrated proof-of-concept² that objectively allocated a star rating based on a heavy vehicle's tailpipe pollution, fuel efficiency, and smart systems. An action to implement the rating was included in the first NAP but has not progressed, as far as we are aware. If implemented, it could materially reduce road freight emissions. It is future-proofed to the extent it already accommodates new technology like battery electric, hydrogen fuel cells, and renewable fuels. It is also equally valid for older trucks and new trucks. This broad applicability is key to the scheme's decarbonisation potential as it does not rely on the slow adoption of ZEV

¹ It is understood the states and Commonwealth are also progressing a star rating for light vehicles even with existing fuel economy/CO₂ information available.

² Funded by the states and Commonwealth, and in-kind support from the Truck Industry Council and some of its OEM members and dealers. It was also cited in the National Freight & Supply Chain Strategy (Action Plan 2019).



technology in new trucks which will be a long process given the high average age of Australian trucks, with a truck purchased today likely to be still operating in 2048.

4. A Green Freight Program is the most effective action to help supply chain decarbonisation. Internationally, sizeable cuts in freight emissions have typically been accompanied by a Green Freight Program. Programs like Smartway in the USA/Canada and the Fleet Operator Recognition Scheme (FORS) in the UK, and organisations like NACFE and Zemo Partnership, have been instrumental in distilling practical operational guidance on freight emissions reductions into one centrally-coordinated knowledge hub and reporting platform. Such a scheme in Australia would provide important linkages with the National Freight Data Hub. Its purpose would be to overcome critical information gaps slowing decarbonisation of road freight, improving knowledge and skills (Goal 5), opening access to data including best-practice benchmarks, leveraging real-world experience to influence freight operators, and building confidence and transparency in areas of high uncertainty (such as new technology costs and effectiveness).

MOV3MENT has conducted foundation scoping for an Australian program on behalf of the federal Department of Industry³. We have benchmarked overseas programs, are in discussions with some state agencies about the concept, and have support from industry to seek government funding to progress some crucial elements (e.g. real-world technology demonstrations and case studies). Some of the overseas organisations mentioned above have also offered advice to create such a program in Australia. The missing element is a firm commitment from government. While government is not always the best "owner" of such a program, it is a critical participant and funder in the establishment phase to leverage industry support.

Monitoring the Performance of the Strategy

Q5. What KPIs are useful to measure the success of the Strategy?

To facilitate the decarbonisation of Australian supply chains, freight data must include emissions and energy metrics. This should include *inter alia*:

- Changes in emissions of greenhouse gases (CO₂e)
- Changes in emissions data by distance, freight throughput (gCO₂e/km, gCO₂e/TEU, gCO₂e/tkm)
- Changes in fossil fuel consumption, by volume and by throughput (L/km, L/TEU, L/tkm)
- Changes in electric freight (kWh, Wh/km)
- Changes in hydrogen freight (kg/H₂)
- Changes in consumption of alternative liquid fuels (L biodiesel, renewable diesel, synthetics etc)

All need to be tracked at both the sector level and, ideally, by vehicle type, and by fleet application or commodity type.

³ Announced and funded by the former government as the Freight Energy Productivity Program (FEPP), progress stalled after the last federal election and current status is unknown.



Q6. What data do we need from industry, state and territory governments to measure potential KPIs?

As a foundational exercise, new data categories must be standardised according to more granular use cases and duty cycles, defined by quantitative energy criteria. Once established, more detailed data collection on energy use/fuel consumption will be required from industry and government to disaggregate supply chains and differentiate individual emissions intensities. Only with this micro-data can genuine emissions reductions actions be properly understood and prioritised within the sector.

Background context

Australia currently has poor data visibility of energy used in freight supply chains. In turn, this makes charting progress on freight decarbonisation a difficult task. If anything, the state of energy data is getting worse, not better. Two examples:

- The <u>ABS Survey of Motor Vehicle Use</u> was a widely used source of real world fuel economy data linked to load and truck type, but has been discontinued;
- "End use energy intensity in Australia" (2015) by the Department of Industry provided a useful split of energy intensity/productivity by passenger and freight transport, but it was discontinued. Some metrics are still available only by paying international sources, yet they use Australian data.

As the only policy/strategy linking all stakeholders (operators, customers, suppliers), all locations, and all freight agencies, the Strategy **must play some role** in fixing data gaps.

For the Strategy to effectively drive decarbonisation, the overwhelming KPI must be tonnes of greenhouse gas emissions emitted by the freight sector. Yet to account for ongoing growth in freight activity and any improvement or deterioration in freight energy productivity, intensity-based KPIs (such as gCO₂e/km, gCO₂e/TEU, gCO₂e/tkm) must also be derived to match preferred industry metrics, and/or to align with the Strategy's ongoing data harmonisation efforts.

Historically, the overwhelming reliance on diesel-based fuels in the freight sector has made aggregate fuel consumption a *de facto* proxy for emissions accounting. However, this is a **blunt instrument that does not yield the granularity of freight energy data required to bring down sectoral emissions**. Without knowing how much energy is used at different links in the supply chain, it is all but impossible to determine where emissions cuts can be made or what abatement options to pursue.

For logistics customers who buy/outsource goods transport services, calculating scope 3 transport emissions relies on estimates of fuel consumption in their transport supply chain, then applying a fuel-based emissions factor from Australia's National Greenhouse Accounts Factors. The Climate Active carbon neutral program has Australian road freight intensity-based metrics available but only to companies being certified under this program. Its limited range of metrics includes a monetary ratio based on dollars spent on road freight (gCO2e/\$) and an intensity metric (gCO2e/tkm) each for vans, rigid trucks and articulated trucks, regardless of size or duty cycle. Climate Active reporters who seek more accuracy often use British transport emission factors for vans, rigids and articulated trucks which provide different factors for various vehicle gross weight ranges across a scale of loading assumptions (from empty through to fully laden). These factors are based on a very different mix of truck types, sizes, duty cycles and operational tasks than in Australia. In this case, a national green freight program could help open up access to relevant, real-world data from participating operators (see previous page and overseas programs like Smartway).

To measure these KPIs, additional data will be needed from industry and government to pinpoint energy consumption (thus emissions reduction potential) at each link in the supply chain. As transport energy sources diversify, this collection and reporting task will grow in complexity to encompass electricity consumption (kWh), hydrogen use (kg/H₂, gaseous and/or liquid) and a growing range of alternative fuels



(Litres of biodiesel/renewable diesel/synthetic fuels, etc). In turn, robust emissions factors must be applied and regularly updated, in line with international best practice and harmonised carbon accounting.

Aside from the energy metrics themselves, categorisation of freight energy demand must also become more specific. **Standardised definitions of major freight applications will need to be developed** – largely from scratch – and coordinated across jurisdictions and industry to ensure readily comparable datasets. Failure to do so will effectively reproduce the suboptimal situation currently in place: we *are* collecting data, but not on what really matters for the energy transition.

Reviews and Papers this Review will consider

Q7. What outcomes, findings or principles should the Review take into consideration from related works?

In addition to confidential reports to clients including government, MOV3MENT has several papers to better inform discussions and policies covering energy and emissions from the freight sector.

- Doubling Energy Productivity in Freight Transport
- Freight Transport Energy Productivity Roadmap
- Overcoming barriers to zero emission trucks
- Reducing scope 3 emissions in the supply chain webinar
- White paper on decarbonising road freight

In addition to the freight-specific papers already referenced, the Review must consider outcomes from policy design in the Australian energy market. At a minimum, these should include:

- Electricity policy & grid integration
- Integrated System Plan 2024 (AEMO)
- Enhanced System Planning (C4NET, iMOVE)
- Vehicle-Grid Integration Standards Taskforce (AEMO)
- Realising Electric Vehicle-to-Grid Service (AEMO/ACT)
- Battery supply chains & critical minerals
- Critical Minerals Strategy 2023-2030
- Queensland Critical Minerals Strategy
- Future Battery Industry Strategy (WA)
- Biofuel & bioeconomy policy
- Bioenergy Roadmap (ARENA)
- Queensland Biofutures
- Bioenergy to Bioeconomy (WA)
- Australian Jet Zero Council

Background context

Because freight decarbonisation is first and foremost about transitioning away from fossil fuels, it cannot be separated from the broader transformation of Australia's energy system. As such, the Strategy should also take account of developments in Australia's emissions and energy policies.



Despite significant uncertainty about the best decarbonisation pathway for Australian freight, it is clear **electrification and battery-power will be key solutions** in at least some parts of the supply chain. Whether it be increased electrification of rail freight, shore/ground power for ships and aircraft, or battery electric trucks, the decarbonised energy needs of the freight sector hold important implications for Australia's electricity network. Managing grid loads from increased vehicle charging (e.g. from battery electric fleets recharging simultaneously) has a direct impact on the future design and reliability of Australia's electricity network. For this reason, the Review should also consider AEMO's ongoing design of future electricity capacity, including the Integrated System Plan 2024 at a minimum.

Similarly, Australia's positioning on critical minerals in the global battery supply chain will impact freight decarbonisation. While battery technology continues to evolve rapidly, Battery Electric Vehicles are already playing a key role in decarbonising specific freight operations and this is projected to increase rapidly in the decade ahead. The supply and availability of such vehicles (and their abatement potential) is **inherently linked to the supply of critical minerals.** How governments at all levels decide to harness critical minerals and batteries will have flow-on effects for freight decarbonisation.

Mov3MENT's internal analysis shows hydrogen's contribution to supply chains will be limited in the near-term and likely uncompetitive over the longer term (vis-à-vis other low emission technologies). Nevertheless, the scope for hydrogen-powered freight (e.g. hydrogen fuel cell trains/trucks, hydrogen combustion engines) will be overwhelmingly influenced by government policies and incentives; so the Strategy should also take these into account.

Of more immediate relevance is the role of renewable liquid fuels and the development of a bioeconomy in Australia. MOV3MENT has modelled scenarios projecting the likely uptake of low-emission technologies in the road freight sector. Even with the most optimistic assumptions for EVs, there will be a persistent demand for high volumes of drop-in renewable fuels – a fact often overlooked in the rush to embrace new vehicle technologies. With renewable feedstocks in limited supply, underinvestment in onshore biofuel processing and demand competition forecast even within Australia's freight sector, successfully integrating biofuel policies may be the most decisive factor for freight decarbonisation in Australia. The Strategy must give due regard to state and federal biofuel initiatives to capitalise on synergies with emissions reductions in the supply chain.

In accounting for policy developments in the energy sector, the Strategy should enshrine **the principle of technology neutrality**. Prioritising one low emission energy vector (e.g. hydrogen) over other sources (e.g. electricity or biofuels) can distort investment incentives and obscure the true viability of decarbonisation options. Of course, there are times when it may be beneficial for governments to partner with industry: on pioneering technology or landmark demonstration projects, for example. In such circumstances, the principle of 'neutrality' should see facilitation provided equally and consistently to all promising technology options, not some at the expense of others. With barely 25 years to decarbonise Australian freight, governments and investors cannot afford to back the wrong horse.



Governance arrangements to support the implementation of the Strategy

Q9. What role, if any, should the Freight Industry Reference Panel have to support the implementation of the Strategy?

The Freight Industry Reference Panel should continue to play an important role feeding industry input into the Strategy, particularly if informed by a dedicated Green Freight Program. However, to better deliver freight decarbonisation in the near-term, the Reference Panel should have more members and upcoming appointments should specifically target expertise in fuel efficiency, energy productivity, and supply chain optimisation. MOV3MENT key staff have recognised expertise in these critical areas.

Q8. Are the current governance arrangements appropriate to support the effective implementation of the Strategy going forward?

There is scope to better engage on-the-ground insights from industry which will be particularly important in achieving emissions reduction across the supply chain. An important addition to the Strategy's governance arrangements would be a dedicated Green Freight Program, acting as both a knowledge-sharing collaboration between industry and government and a co-investment partnership.

Background context

The Review offers a timely opportunity to embed industry insights that will be critical to driving down freight emissions. Broadly, the Strategy's governance arrangements have suffered from a lack of direct engagement with industry – those who are responsible for 'doing' decarbonised freight in Australia. While the goal of emissions reduction is clear, **the 'how' will necessarily depend on real-world contributions** from those testing, investing, experimenting, and scaling zero emission initiatives 'on the ground'. Feeding this directly and efficiently back to policymakers at all levels of government will be instrumental in accelerating zero emission freight solutions efficiently.

Here, the aforementioned Green Freight Program could play a decisive role. As a dedicated knowledge-sharing platform (under the broader Strategy or as a standalone initiative), it would unite freight operators and governments in publicly disseminating knowledge and insights to guide the broader freight industry to net zero. In particular, a Green Freight Program would offer a governance structure that could facilitate co-investment in net zero supply chains. Incorporating a dedicated demonstration program for new technology and decarbonisation projects aligns with government emissions targets, the National Freight Data Hub, and the objectives of the Strategy more broadly.

In turn, a Green Freight Program would facilitate the role of the Freight Industry Reference Panel and its core function of feeding industry views to the Strategy's other governance bodies. However, for the Reference Panel to deliver on the Strategy's future decarbonisation objectives, it will need to materially boost its expertise in emissions reduction and zero emission freight solutions.



ABOUT MOV3MENT

Motor vehicles enable the modern economy but also impose burdens on society. MOV3MENT's mission is to make vehicles part of the solution not the problem. We take complex questions on energy, cost and emissions and simplify them into actionable fleet strategies, policies, and programs.

Our knowledge and advice are built on practical, cost-effective improvements that benefit vehicle operators and the community, with a particular focus on truck and bus operators, suppliers, and policymakers.

We leverage this knowledge to help governments develop programs and policies that overcome barriers to improvement, demonstrate real-world benefits, and increase awareness and knowledge. This includes innovation projects that use information to transform the market – like our world-first Smart Truck Rating.

We're fiercely proud of the things that set us apart: our independence, our principled approach, and our evidence-based advice.

To accelerate your net zero transition, get in touch via email info@mov3ment.com.au or find out more on our website www.mov3ment.com.au.



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