Organisation questionnaire response

Privacy Setting: I agree for my response to be published with my name and position.

What organisation do you represent? (required)	Beyond Zero Emissions
What is your name? (required)	Rowan Moorey
What is your position at the organisation? (required)	Senior Researcher
Please rank the proposed options in order of preference. (optional)	Option A - 3rd, Option B - 2nd, Option C - 1st
Briefly, what are your reasons for your choice? (optional, 3000 character limit)	Beyond Zero Emissions (BZE) is an independent solution focussed think tank and we strongly endorse the Australian Government's work on advancing the rollout of electric vehicles (EVs) and implementing a New Vehicle Efficiency Standard (NVES). Our 2022 Deploy report (https://www.bze.org.au/research/report/deploy) highlighted the need for a strong and effective NVES, in that report, we noted: "An ambitious EV deployment plan [strategy] is critical to reduce emissions, reduce freight and supply chain costs, and eliminate bowser bills for households and industry - reducing our dependence on imported oil. Australia requires a nationwide plan to deploy EVs across all vehicle types, with success in countries such as Norway offering a playbook to emulate." Option C is BZE's preferred option as it reduces emissions as fast as possible whilst also providing the largest benefits to Australians such as cutting the cost of living for Australians, providing the highest health benefits, boosting national energy security, and improving vehicle safety. Delivering an effective fuel efficiency standard for Australia's light vehicle fleet is an essential step to drive down carbon pollution. Option C is most closely aligned with a trajectory that puts Australia on the path to

	reach net zero by 2050 - according to IEA (https://www.iea.org/reports/net-zero-by-2050) and CSIRO (https://aemo.com.au/-/media/files/electricity/nem/planning_and_forecasting/inputs-assumptions-methodologies/2021/csiro-ev-forecast-report.pdf). Option C aligns closely with the European vehicle standards, given Australian alignment with other European standards, its recommended penalties are also aligned. The European Union has established a penalty of $197 per gram per kilometre (equivalent in Australian dollars) for exceeding the prescribed CO2 emissions per kilometre target (https://climate.ec.europa.eu/eu-action/transport/road-transport-reducing-co2-emissions-vehicles/co2-emission-performance-standards-cars-and-vans_en). https://www.infrastructure.gov.au/sites/default/files/migrated/vehicles/environment/forum/files/heavy-vehicle-emission-standards-for-cleaner-air.pdf The exclusion of supercredits and other exploitable gaps in regulations, as seen in both options B and C, represents a commendable approach. Such measures are essential for maintaining the integrity and efficacy of the regulatory framework. It is reasonable and justifiable to include SUVs within the passenger vehicle classification, as proposed in options C and B. Larger vehicles for utility or commercial purposes are appropriately addressed under the light commercial vehicle (LCV) category.
Do you support the Government's preferred option (Option B)? (optional)	The New European Drive Cycle (NEDC) emission model used in the consultation paper was adopted 50 years ago and is no longer 'new', it is therefore suboptimal for accurately measuring emissions. There is an increasing difference between the NEDC test results and actual on-road emissions, in 2021 there was 45% difference. (https://theconversation.com/australian-passenger-vehicle-emission-rates-are-50-higher-than-the-rest-of-the-world-and-its-getting-worse-222398). The European Union uses the fit-for-purpose Worldwide Harmonised Light-Vehicles Test Procedure (WLTP) emissions model which would be ideal for robust Australian analysis too (https://climate.ec.europa.eu/news-your-voice/news/collecting-real-world-data-co2-emissions-and-fuel-consumption-new-cars-and-vans-2021-03-05_en). If Australia wants to reduce its transport emissions to meet climate targets such as 43% by 2030 then it needs to be accurately tracking emissions.
Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)	NULL

Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	NULL
Who should the regulated entity be? (optional, 3000 character limit)	NULL