



Climate Action Merribek
P.O. Box 381
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21 February 2024

To: Dept of Infrastructure, Transport, Regional Development, Communications and the Arts

Submission on New Vehicle Efficiency Standard (NVES)

We appreciate this opportunity to make a submission on The New Vehicle Efficiency Standard. We appreciate the work in presenting and explaining the three options in the Policy Impact Analysis report. The document has been read in full to inform this submission. We featured the NEVS Impact analysis on our website on 7 February: [New Vehicle emission standards proposed to start from 2025](#)

We are a grassroots group of citizens in the municipality of Merri-bek in Melbourne's Northern suburbs active on climate advocacy since 2008. We bring our own experience as residents, and also knowledge of climate science and need for rapid decarbonisation to address the climate emergency.

John Englart
Convenor, Climate Action Merribek
for and on behalf of Climate Action Merribek

Executive Summary

Our key recommendations for the New Vehicle Efficiency Standard:

1. The current climate emergency and need to reduce transport emissions should determine target strength
2. While Option C and B are both acceptable, Option C is preferable as it ramps up faster, and has stronger targets, more emissions reduction.
3. NEVS should be started 6 months sooner, from July 2024 in trial mode.
4. Targets are sufficiently distant for supply to catch up.
5. SUVs should be considered passenger vehicles
6. The NVES should encourage lighter vehicles
7. Penalties should be substantial
8. Loopholes should be ruled out
9. Emissions should be tested in real time

Question 3: Please rank the proposed options in order of preference

Answer : 1. Option C; 2. Option B; 3. Option A

Question 4: Briefly, what are your reasons for your choice? (optional, 3000 character limit)

The current climate emergency and need to reduce transport emissions should determine target strength

- The NVES should set emission targets over a timeframe that reflects the urgency of the climate crisis.
- This requires a transition to all new passenger and light commercial vehicle sales being zero emission vehicles (ZEVs) by 2035 at the latest.
- Option C and B are both acceptable as they would make that goal achievable, Option C is preferable as it ramps up faster, and has stronger targets.
- We also advocate for starting the standard from 1 July 2024 for the first 6 months in a trial mode before full implementation from January 2025..

It is clear that moving faster will result in lower emissions and fuel savings for Australia over a longer period, compounding the benefits of the policy.

We note that the impact analysis estimates that by 2050, option C will reduce CO2 emissions by an additional 74 million tonnes, which will help the Government meet its climate targets in a context where other sectors face even greater challenges to reduce emissions.

Targets are sufficiently distant for supply to catch up

There is more than enough lead time for vehicle importers to meet the stricter targets under option C (which only kick in from 2026 onwards). Two years is sufficient time for car makers to adjust their supply, given the number of ZEVs already on the global market and more under development.

Car companies have known of the Government's intention to introduce some form of NVES since at least 2022 (and perhaps going back a decade or more).

We note that 85% of the world is already covered by emissions standards, making this change foreseeable.

If there is a short period where a number of the most polluting vehicles in

Australia increase in price due to penalties under Option C, that can be managed through car companies buying credits from 100% ZEV car makers, further subsidising their price, and encouraging the overall shift.

SUVs should be considered passenger vehicles

Option C and B rightly include SUVs in the passenger vehicle category.

There is no justification for a higher CO2 limit for a vehicle that is larger due to consumer preference, rather than for a genuine utility or commercial reason (which is covered by the LCV category).

The NVES should encourage lighter vehicles

The Government should consider lowering the break point for vehicles to 1800 kg or less, or better yet, eliminating the weight based adjustment altogether, to encourage the purchase of smaller, lighter vehicles.

Here in Merri-bek in the northern suburbs of Melbourne we note the increase in SUVs and large dual cab utes parked in our suburbs and on our roads, which adds to actual and perceived safety issues in our municipality for active transport and imperils adoption of more of walking and cycling in our urban area.

Penalties should be substantial

The EU has a penalty of \$197 per g/km (AUD equivalent) for exceeding their CO2/km target – to get close to that, the penalty proposed under option C should be adopted in Australia.

Loopholes should be ruled out

Ruling out supercredits and loopholes are an excellent feature of both B and C. Banking and trading of credits is acceptable if limited in scope – these should not be expanded beyond the 2 years suggested by Option C.

Emissions should be tested in real time

The Government should also implement real-world testing of vehicle emissions (onboard fuel consumption monitoring) to prevent manufacturers from producing laboratory testing which is inaccurate, as they have done in the past.

Question 5: Do you support the Government's preferred option (Option B)? (optional)

Answer: 'yes'



Organisation questionnaire response

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

What organisation do you represent? (required)	Climate Action Merribek
What is your name? (required)	John Englart
What is your position at the organisation? (required)	Convenor
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)	<p>See attached submission. Our key recommendations for the New Vehicle Efficiency Standard:</p> <ol style="list-style-type: none">1. The current climate emergency and need to reduce transport emissions should determine target strength2. While Option C and B are both acceptable, Option C is preferable as it ramps up faster, and has stronger targets, more emissions reduction.3. NEVS should be started 6 months sooner, from July 2024 in trial mode.4. Targets are sufficiently distant for supply to catch up.5. SUVs should be considered passenger vehicles6. The NVES should encourage lighter vehicles7. Penalties should be substantial8. Loopholes should be ruled out9. Emissions should be tested in real time
Do you support the Government's preferred option (Option B)? (optional)	Yes



Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)	-
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	-
Who should the regulated entity be? (optional, 3000 character limit)	-