



Organisation questionnaire response

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

What organisation do you represent? (required)	Colormaker Industries, a sustainable paint and ink manufacturer
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>We should make Australia's Standard the strongest in the world. The strong headline target and fleet limit curve rules of Option C will help us both catch up and stay at the front of the global queue for efficient vehicles, making the Australian market extremely attractive for low and zero-emissions vehicles; save Australian consumers the most money in the long term; and reduce carbon emissions in the fastest way.</p> <p>Although the headline targets of Option B are good, they would only have us catch up to the US, and stay behind most other car markets (including right-hand drive markets like the United Kingdom and New Zealand). Sufficient notice has been given to manufacturers. Both Options B and C allow manufacturers two years before strong limits are set, which is more than enough time to adjust their supply. The Government has been clear about its intention for a New Vehicle Efficiency Standard since 2022, and Australia is one of the last developed countries to implement one. Benefits to consumers should be a priority.</p> <p>In the current cost of living crisis, the government should be prioritising options that lead to more wins for consumers. The benefit-to-cost ratio of Option B and C are very similar (4% difference), but the net benefits of Option C are far greater (18% difference). Penalties should match the rest of the world. The penalty price of Option C is more comparable to the European Union and will force manufacturers to comply and prioritise the Australian market. As the Government found, there is no evidence this will increase vehicle prices. Credits should expire within two years.</p> <p>The shorter expiry of credits in Option C means that overperforming manufacturers (such as electric vehicle-only manufacturers like Tesla and BYD) have a shorter time to sell their credits to other companies, making a slightly fairer playing field. No dodgy loopholes for mainstream technology.</p>



	<p>As in both Options B and C, excluding technology credits creates more transparency and simplicity in the scheme, and increases positive results for Australian consumers and carbon emissions. Multiplier credits in particular should be ruled out entirely. SUVs should be classified as passenger vehicles. As in both Options B and C, including SUVs and in the “Passenger Vehicle” category is smart and makes the Australian NVES stronger, especially given the consumer preference for larger vehicles. The Light Commercial Vehicle category should exist for genuine utility and commercial vehicles, not for bigger cars by default.</p>
<p>Do you support the Government's preferred option (Option B)?</p> <p>(optional)</p>	No
<p>Do you have any feedback on the analysis approach and key assumptions used?</p> <p>(optional, 3000 character limit)</p>	NULL
<p>Briefly, describe how the NVES might impact your organisation</p> <p>(optional, 3000 character limit)</p>	<p>It would lower our costs and those of our staff. We already have a huge solar surplus and if our staff could plug in during the day, then a lot of the strain on the grid could be reduced, as could the strain on our balance of trade by reducing the amount of petrol and diesel that we have to import. Given that Australia gets more sunshine than any other country in the world, we'd be playing to our own strengths to accelerate the uptake of EVs. Cost remains the biggest barrier to EV adoption by the bulk of the population, so if</p> <p>a) new vehicles were cheaper in the first place and b) that accelerated the growth of the 2nd hand market, we'd be able to dramatically ramp up adoption of EVs and dramatically reduce our dependence on imported fossil fuels, the latter being an increasingly fraught contributor to sovereign risk. Shipping lanes can be a lot more easily disrupted than access to sunshine. In this cost of living crisis, this would be a HUGE boon to the economy and would be anti-inflationary. I would also note that Europe was taking their time with a slow transition away from fossil fuels and were horribly undone by the Russian invasion of Ukraine. We should not wait for similar events in our region to unfold before we acknowledge and indeed embrace the need for urgency.....so it's not JUST for the climate; there are sovereign risk considerations in play here too.</p>
<p>Who should the regulated entity be?</p> <p>(optional, 3000 character limit)</p>	NULL