Cleaner, Cheaper to Run Cars: The Australian New Vehicle Efficiency Standard

Submission to the Australian Department of Infrastructure, Transport, Regional Development, Communications and the Arts consultation

March 2024

Doctors for the Environment Australia

60 Leicester Street,
Carlton Vic. 3053
0422 974 857
admin@dea.org.au
www.dea.org.au

About Doctors for the Environment Australia

Doctors for the Environment Australia is an independent, non-government organisation of medical doctors and students in all Australian States and Territories. Our voluntary members work across all specialties in community, hospital, and private practice to prevent and address the diseases – local, national, and global – caused by damage to our natural environment. We are a public health voice in the sphere of environmental health with a primary focus on the harms to health from pollution, environmental degradation and climate change.

Acknowledgement of Country

As a national organisation, we acknowledge the traditional owners of the land across Australia and pay our respects to their Elders past, present and emerging future generations.

Doctors for the Environment Australia (DEA) thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for the opportunity to make this submission on the most significant transport policy initiative in decades. DEA has long called for a fuel efficiency standard as a health measure, bringing down emissions harmful to health and the environment.

Background

During the Covid-19 pandemic and subsequent years the government introduced a stimulus package, including an instant asset tax write-off between $30,000 and $150,000 per asset for qualifying businesses.[1] One consequence of this policy was a rise in sales of large, highly polluting 'utes' as manufacturers of these vehicles advertised them heavily and people bought them to use as family cars. [2] The tax write off was reduced in 2023[3] but such vehicles continue to be advertised as desirable family assets and are now in the top selling list. This could not have happened with a fuel efficiency standard in place, as dealers would have had to import and market a range of cars including low emission and zero emission vehicles. Australia has been recognised as a dumping ground for inefficient, polluting vehicles,[4] with no fuel efficiency standard and outdated noxious emission standards.

Recommendations

- Prioritise public transport, active transport, and micro-mobility solutions to reduce congestion, improve air quality and health as well as bring down emissions.[5]
- A strong fuel efficiency standard is a key part of minimising emissions from internal combustion engine vehicles.
- Implement the fuel efficiency standard in January 2025, so the 2025 average will be lower than the business as usual expected value of 141 g/kg.
- DEA supports option C as providing the greatest health and environmental benefits. Option B would appear to be the most easily achievable in the short term, but allows more room for large vehicles, potentially reducing the effectiveness of the standard.

[1] Government's Instant Asset Write-Off Changes Explained | Bill Robertson Toyota
[2] Ute Beauty! Instant Asset Write-off Extended | Drive Car News
[3] Investment jumps as tradies rush on ute tax break
[4] Australia becoming a 'dumping ground' for polluting cars as government delays signing on to international standards - ABC News
[5] Trips on public transport, walking and riding must triple to see genuine transport emissions reduction: Climate Council report

- Set the standard to bring Australia rapidly into line with standards in the US and EU as set out in the Department's paper, and on a trajectory consistent with the emission reduction target of 43% by 2030 and Article 4 of the Paris Agreement.
- Introduce noxious emissions standard Euro 6d early in 2025 to coincide with the introduction of the New Vehicle Emission Standard.
- We do not support the use of an emissions curve. All covered vehicles should be treated as a single class regardless of weight, to avoid allowing heavier vehicles to be less fuel efficient. This reduces the perverse incentive towards the use of heavier vehicles.
- Bring forward 'real world' emissions testing for vehicles, Worldwide Harmonised Light Vehicle Test Procedure (WLTP) or better. Ensure credits are for real reductions in tailpipe emissions, determined by real world testing.
- Legislate for targets, compliance and penalties rather than placing these in regulations that are more easily changed and would create less market certainty.
- Exclude off cycle and air conditioning credits from the New Vehicle Emission Standard.
- Electrify the national bus fleet, starting with school buses, and electrify all government vehicle fleets.
- Develop a national transport decarbonisation plan across all jurisdictions to bring Australia's emissions reductions into line with science-based targets.[6]

Health and fuel efficiency standards

Why is a medical organisation, DEA, advocating introduction of a fuel efficiency standard?

DEA's engagement with transport policy stems from major transport related health issues impacting the health of all Australians. Firstly, transport is a major contributor to the climate emergency, primarily through the burning of fossil fuels. Secondly, transport is the main source of noxious air pollutants for urban populations. Thirdly, vehicles are responsible for a significant level of direct trauma resulting in death and morbidity. DEA's position on vehicle pollution and emission standards has been set out in previous submissions and DEA's Transport Position Statement.

- Submission to the Better Fuel for Cleaner Air Discussion Paper 2017
- Submission to The Department of Infrastructure and Transport Vehicle fuel efficiency standards for Australia 29 May 2023
- DEA's Position Statement on Transport 2017

[6] Climate Council Australia - New Vehicle Efficiency Standard submission

A fuel efficiency standard and climate change

Climate change is described as the greatest health threat of the 21st century by the World Health Organisation, the Lancet Commission and public health experts internationally.[7,8,9]

Globally, climate change is causing conflict, uncontrolled migration, habitat and species loss, changing patterns of human disease, drought, fires, floods, food insecurity and starvation, loss of essential aquifers and potable water as well as heat in the tropics so intense as to render outdoor labour impossible. Melting of glaciers in southeast Asia threatens the lives of 2 billion people over the coming century.[10,11]

Climate scientists warn of tipping points in earth's climate system resulting in stepwise and rapid escalation of climate impacts.[12,13]

Australia is not immune to climate change impacts, with extreme weather on display in recent years. As the State of the Environment Report 2022, produced by the Bureau of Meteorology and the CSIRO, stated:

> *Observations, reconstructions of past climate and climate modelling continue to provide a consistent picture of ongoing, long-term climate change interacting with underlying natural variability. Associated changes in weather and climate extremes— such as extreme heat, heavy rainfall and coastal inundation, fire weather and drought—have a large impact on the health and wellbeing of our communities and ecosystems. These changes are happening at an increased pace—the past decade has seen record-breaking extremes leading to natural disasters that are exacerbated by anthropogenic (human-caused) climate change.*[14]

While there has been a steady and gratifying decline in emissions from the electricity sector, transport emissions have rebounded following the early COVID-19 period.[15]

Transport emissions now account for about 19% of all emissions in Australia.[16] Australia will be unable to meet its climate commitment of 43% reduction of emissions on 2005 levels by 2030 without strong action in the transport sector. A fuel efficiency standard is an important step but must be accompanied by a major investment in public transport, active transport and urban planning.[17]

---

[7] The Lancet Countdown on health and climate change | The Lancet.
[8] Tackling climate change could be the greatest global health opportunity of the 21st century | Climate and Health Alliance
[9] WHO calls for urgent action to protect health from climate change | World Health Organization 2015
[10] As Himalayan Glaciers Melt, a Water Crisis Looms in South Asia - Yale E360
[11] Ep3: Himalayas' Melting Glaciers Impact Billions | Asia Society
[12] Expert reaction to The Global Tipping Points Report 2023 | Science Media Centre
[13] Q&A: Climate tipping points have put Earth on 'disastrous trajectory', says new report - Carbon Brief
[14] State of the Climate 2022: Bureau of Meteorology
[15] Quarterly Update of Australia's National Greenhouse Gas Inventory: June 2023
[16] Reducing transport emissions | DCCEEW
[17] Shifting gear: the path to cleaner transport | Climate Council

It is disturbing to note that almost all of the media coverage of the fuel efficiency standard disregards the climate emergency and health consequences of an over-reliance on motor vehicles.

The noxious pollution problem

The New Vehicle Efficiency Standard is designed to bring down the average carbon emissions of each manufacturer's fleet. Importantly, one outcome of this policy will be a reduction in noxious emissions harmful to humans. The long overdue adoption of Euro 6 emission standards for new cars will ensure the best vehicle emission controls are present in each vehicle coming onto the market. The synergy between the Euro 6 standard and the fleet-based New Vehicle Efficiency Standard will ensure cleaner air for commuters and those living and working along major roads.

Noxious emissions of nitrogen dioxide, particulates, carbon monoxide, and ozone are produced from internal combustion engines. There is a large body of evidence to show that tailpipe pollution contributes to cardiovascular, respiratory, neurological, and other systemic disease. [18,19]

The main offenders are nitrogen dioxide and particulates. Over half of air pollution in Australia is from traffic pollution. The Australian Institute of Health and Welfare estimated in 2012 that 3,000 premature deaths per year were attributable to air pollution.[20,21]

Data extrapolated by the University of Melbourne (Melbourne Climate Futures) from the New Zealand HAPINZ study (Health and Air Pollution in New Zealand) suggests this figure for Australia is an underestimate. The real impact of NO_2 and particulate pollution is more likely 11,105 premature deaths, over 12,000 cardiovascular hospitalisations, over 6,800 respiratory hospitalisations and 66,000 asthma episodes in those aged 0 to 18 years.[22]

Air pollution has also been linked to earlier dementia, type 1 diabetes, premature labour[23] and decreased birth weight,[24] lung cancer[25] and stroke.[26,27]

[18] Ambient Air Pollution and Stroke: An Updated Review | Stroke
[19] LA environmental success story cleaner air healthier kids | University of Southern California
[20] 3,200 deaths a year: 1 of many reasons air pollution in Australia demands urgent national action | University of NSW
[21] Natural environment and health - Australian Institute of Health and Welfare
[22] Expert Position Statement: Health impacts associated with traffic emissions in Australia | University of Melbourne
[23] Association of Air Pollution and Heat Exposure With Preterm Birth, Low Birth Weight, and Stillbirth in the US: A Systematic Review | JAMA Netw. Open
[24] The association between air pollution and preterm birth and low birth weight in Guangdong, China | BMC Public Health
[25] Air Pollution and Lung Cancer: A Review by International Association for the Study of Lung Cancer Early Detection and Screening Committee | Journal of Thoracic Oncology
[26] Air pollution linked to dementia cases | National Institutes of Health (NIH)
[27] Air Pollution and Dementia: A Systematic Review | Journal of Alzheimer's Disease

The ACHAPS study (Australian Children's Health and Air Pollution Study) showed that even small changes in low levels of NO_2 had a relatively large effect on asthma prevalence in children.[28,29]

The net benefit for the health sector in option B is $5.2 billion, and in option C is $6.75 billion. The assumptions used for health are based on a change in emissions only and do not include the health impacts of climate change.

Road safety co-benefits

Vehicle size and vulnerable road users.

In Australia in 2023 there were 158 road fatalities of pedestrians and 36 of cyclists out of the total national road fatalities of 1266 people. The number of people severely injured is generally about ten times the number of fatalities, with many people suffering life changing disability as a result of their injuries. We are concerned that the increasing number of large and heavy vehicles on the road is increasing the health burden from road injury, especially on people walking or cycling.

The analysis of benefits of the options presented in the National Vehicle Efficiency Standard includes a value for the deaths averted due to reduced air pollution, but does not include a value for the deaths that would be prevented if the car fleet included fewer vehicles with high front ends and high centre of gravity, that is the sport utility vehicle (SUV), twin cab and 4WD models. The New Fuel Efficiency Standard could have a community co-benefit if one of the outcomes was to reduce the sale of these excessively large vehicles.

DEA is arguing for no limit curve, or a flattened limit curve as in option C, noting that the limit curve is based on the fleet of vehicles sold in 2022. This is a poor metric, given that the 2022 fleet was heavily biased towards large SUVs as a result of the stimulus package, the enthusiasm of companies to market them, and their perceived advantages.[30]

Detailed analysis of pedestrian fatalities by vehicle type show that larger cars have higher risk to pedestrians.

Sims 2006[31] showed in engineering experiments with crash dummies that (emphasis added):

> *…an important effect of the higher front profile of SUVs is that the pedestrian is struck more centrally with respect to the body's centre of gravity, increasing the momentum transfer in the primary impact. A further important effect of the higher bonnet leading edge is that there is a*

[28] The Australian Child Health and Air Pollution Study (ACHAPS): A national population-based cross-sectional study of long-term exposure to outdoor air pollution, asthma, and lung function | Environment International

[29] Opportunity to reduce paediatric asthma in New South Wales through nitrogen dioxide control | Australian and New Zealand Journal of Public Health

[30] SUVs are more popular than ever in Australia – but there is a downside | Road transport | The Guardian

[31] Simms CK, Wood DP. Pedestrian Risk from Cars and Sport Utility Vehicles - A Comparative Analytical Study | Proceedings of the Institution of Mechanical Engineers

direct impact to the mid-body region, which explains the significant abdomen and other internal injuries reported from real-world SUV/pedestrian impacts. By comparison, head injuries sustained from primary vehicle contact are shown to be similar or slightly lower for SUV/pedestrian impacts compared to car/pedestrian impacts. However, real-world evidence and the current models suggest that the secondary impact with the ground is more severe in SUV/pedestrian impacts compared to car/pedestrian impacts. Overall, these results show that the empirical finding that SUVs are more hazardous for pedestrians than passenger cars is primarily a function of the ***high bumper and bonnet*** *for such vehicles.*

Edward & Leonard 2022[32] examined both crash data and hospital records in the USA. They found that children are eight times more likely to die when struck by a SUV compared to those struck by a passenger car. Though pickup trucks were the striking vehicle in just 5.6% of pedestrian and cyclist crashes, they were involved in 12.6% of fatalities. SUVs were similarly overrepresented in fatalities relative to the proportion of their involvement in all crashes. SUVs struck 14.7% of the pedestrians and cyclists investigated here, but were involved in 25.4% of the fatalities.

Desapriya 2010[33] in a systematic review found 12 papers addressing this question, of which 11 could be combined in meta-analysis of the risk of pedestrian fatality after being hit by a light truck vehicle versus a conventional car. The result was OR 1.54 (95%CI 1.15, 1.93), that is 54% increased risk of death.

Tyndall 2021[34] examined all road fatalities in the US over a 19 year period and estimated that if the growth in SUVs had been replaced by conventional cars it would have averted 1,100 pedestrian deaths.

Due to the non-standardised classification of vehicle types we have been unable to determine the current proportion of the vehicle fleet that have the dangerous high profile bonnets examined in the quoted research. So, we present a hypothetical comparison of pedestrian injury risk for a vehicle fleet with 50% high front vehicles, and a counterfactual fleet with 10% of such vehicles. As SUV/4WD and light commercial vehicles comprised 78% of new vehicle sales in 2023,[35] they may well be 50% of the on-road fleet, and our counterfactual reflects that maybe 10% of the users actually need the cargo carrying capacity of these big vehicles. Most of them are picking up shopping at supermarkets or kids from schools, functions done perfectly adequately by safer cars.

[32] Edwards M, Leonard D. Effects of large vehicles on pedestrian and pedalcyclist injury severity | Journal of Safety Research 2022

[33] Desapriya E, Subzwari S, Sasges D, Basic A,Alidina A, Turcotte K, Pike I. Do light truck vehicles (LTV) impose greater risk of pedestrian injury than passenger cars? A meta-analysis and systematic review | Traffic Injury Prevention 2010

[34] Tyndall J. Pedestrian deaths and large vehicles - Economics of Transportation 2021

[35] Australia breaks all-time new vehicle sales in 2023 | Federal Chamber of Automotive Industries

Example	
The proportion of tall front vehicles: Scenario 1	50%
The proportion of tall front vehicles: Scenario 2	10%
The increased risk from high vehicles:[33]	1.54
Pedestrian fatalities in 2023:[36]	158 individuals
Statistical value of a life:[37]	$5.4 million
Proportion of fatalities due to high vehicles in Scenario 1 = 0.2126 =	33.6 individuals
Reduction in annual fatalities under Scenario 2	26.9 individuals
Valuation of reduced annual mortality	$145 million
Net present value to 2050 (discount 4%, fleet change over 10 years)	$1.13 billion
Net present value to 2050 (discount 7%, fleet change over 10 years)	$1.71 billion

Conclusion on road safety co-benefits

The proliferation of large vehicles[38] on the road has made the environment more dangerous for pedestrians, cyclists, and drivers of smaller cars. Existing vehicle design rules have allowed this to occur, even while public policy statements encourage active transport, walking and cycling, for a range of good public health reasons. The New Vehicle Efficiency Standard is an opportunity to slant the market back towards smaller and safer vehicles. We have presented a 'back of the envelope' calculation of the community benefits available by reversing this trend, yielding a substantial annual benefit of 27 fewer pedestrian fatalities conventionally valued at $145 million per year and cumulative value of $1.71 billion. We encourage the Department of Infrastructure, Transport, Regional Development, Communications and the Arts to repeat this analysis with greater refinement, that is. more formal inputs, and inclusion of the effects for cyclists and occupants of smaller cars. The road safety benefit must be recognised in the vehicle efficiency decision process.

Equity, car culture and advertising

Australia has a deeply embedded car culture, born of open spaces and urban sprawl. There are more cars than licensed drivers. Children are now more likely to be driven to school than to commute by walking or public transport. Public transport infrastructure is poor and treated with disdain by many drivers. Congestion, with its attendant frustration, delays, impacts on productivity, and deleterious health consequences is tolerated by drivers. Many commutes are by single occupants, often in large SUVs, or twin cab 'utes' with high CO_2 and other noxious emissions.

Choice of vehicle is an election battleground – one's right to have a very large and polluting vehicle currently trumps others' right to clean air.

Choice is not a simple matter. Tradespeople often need larger cars or utilities and many took advantage of subsidies provided during the early phases of the pandemic. Large and heavy vehicles

[36] Road Deaths Australia—Monthly Bulletins | Bureau of Infrastructure and Transport Research Economics
[37] Value of statistical life | The Office of Impact Analysis
[38] SUVs are more popular than ever in Australia – but there is a downside | Road transport | The Guardian

are among the top sellers, with dual cab utes and SUVs being 78.4% of vehicles sold in 2023.[39] They are heavily advertised as family friendly, ready for weekend camping or fishing trips. The reality is that most of these cars are used for local trips, shopping, school drop-offs and getting to work. They are part of the 'dumping' problem, whereby manufacturers of these vehicles found a market in Australia for them because of our poor emission standards.

DEA agrees with Engineers Australia[40] that mass-based limit curves in the New Vehicle Emission Standard create a perverse effect by driving sales of heavier cars resulting in more CO_2, more noxious emissions, greater risks for pedestrians and cyclists, and more road wear. Tradespeople and others who require a heavy vehicle for work have a business case that easily covers any increase in purchase cost.

Size matters. DEA is arguing for no limit curve or a flattened limit curve as in option C, noting that the limit curve is based on the fleet of vehicles sold in 2022. This is a poor metric, given that the 2022 fleet was heavily biased towards large twin cabs and SUVs as a result of the stimulus package, the enthusiasm of companies to market them, and their perceived advantages.[41] That bias appears to have lingered in subsequent years, with the top 3 selling cars in January 2024 all being over 1500 kg kerb weight.[42]

Large cars pollute more, are more dangerous for pedestrians and other road users, and cause more intense road wear. These facts should be reflected in the design of the fuel efficiency standard.

It has been suggested that ‘ordinary people will be called upon to subsidise the green choices of those who are better off’ if a fuel efficiency standard is introduced.[43] This statement disregards the fact that everyone benefits from cleaner air, and those who live and/or work close to major thoroughfares will benefit more.[44,45] Furthermore, there is no reason to believe that a low emitting small car of any sort will be more expensive because of the standard. For the many who live or work along major traffic corridors, the reduction in noxious emissions will be a welcome change for their health.

Changing the car culture, getting people out of their cars, encouraging walking, cycling and public transport must be seen as the most effective pathway to lower emissions and better health. However, a strong fuel efficiency standard for those internal combustion engine vehicles that are being used is a step in the right direction for everyone.

---

[39] Australia's top-selling cars, utes, and SUVs of 2023 | RACV

[40] Engineers Australia Fuel Efficiency Standard submission 31 May 2023

[41] SUVs are more popular than ever in Australia – but there is a downside | Road transport | The Guardian

[42] Top-Selling Cars Australia | 10 Best Models January 2024 – Canstar Blue

[43] The Australian 6 Feb 2024

[44] Who is Most Affected by Outdoor Air Pollution? | American Lung Association

[45] 6.0 Objection to the health impacts - WestConnex Action Group

Conclusion

Public transport, active transport, and micro-mobility solutions should be prioritised to reduce congestion, improve air quality and health as well as reduce emissions.

In addition, a strong fuel efficiency standard is a key part of minimising the emissions of internal combustion engine vehicles.

- DEA supports Option C of the proposed New Vehicle Emission Standard which set Australia on a trajectory to zero CO2 emissions for vehicles by 2035 in line with a net zero 2050 target and article 4 of the Paris Agreement.
- The headline targets should align Australia with countries with similar car markets, including the USA, EU and New Zealand by 2026/2027.
- Any higher limits for heavier passenger vehicles should be avoided. In particular, limit curves must not cause the perverse result of favouring heavy vehicle sales.
- Supercredits and off-cycle credits should be excluded.

Organisation questionnaire response

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

What organisation do you represent? (required)	Doctors for the Environment Australia
What is your name? (required)	Genevieve Cowie
What is your position at the organisation? (required)	Research, Education & Advocacy Committee 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)	DEA supports option C as providing the greatest human health and environmental benefits. Option B would appear to be the most easily achievable in the short term, but allows more room for large vehicles, potentially reducing the effectiveness of the standard.
Do you support the Government's preferred option (Option B)? (optional)	No
Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)	Implement the fuel efficiency standard in January 2025, so the 2025 average will be lower than the business as usual expected value of 141 g/kg. Set the standard to bring Australia rapidly into line with standards in the US and EU as set out in the Department's paper, and on a trajectory consistent with the emission reduction target of 43% by 2030 and Article 4 of the Paris Agreement. Introduce noxious emissions standard Euro 6d early in 2025 to coincide with the introduction of the New Vehicle Emission Standard. We do not support the use of an emissions curve. All covered vehicles should be treated as a single class regardless of weight, to avoid allowing heavier vehicles to be less fuel efficient. This reduces the perverse incentive towards the use of heavier vehicles. Bring forward 'real world' emissions testing for vehicles, Worldwide Harmonised Light Vehicle Test Procedure (WLTP) or better. Ensure credits are for real reductions in tailpipe emissions, determined by real world testing. Legislate for targets, compliance and penalties rather than placing these in regulations that are more easily changed and would create less market certainty. Exclude off cycle and air conditioning credits from the New Vehicle Emission Standard. Electrify

	the national bus fleet, starting with school buses, and electrify all government vehicle fleets. Develop a national transport decarbonisation plan across all jurisdictions to bring Australia's emissions reductions into line with science-based targets.
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	DEA's engagement with transport policy stems from major transport related health issues impacting the health of all Australians. Firstly, transport is a major contributor to the climate emergency, primarily through the burning of fossil fuels. Secondly, transport is the main source of noxious air pollutants for urban populations. Thirdly, vehicles are responsible for a significant level of direct trauma resulting in death and morbidity. DEA's position on vehicle pollution and emission standards has been set out in previous submissions and DEA's Transport Position Statement (in attached submission). Climate change is described as the greatest health threat of the 21st century by the World Health Organisation, the Lancet Commission and public health experts internationally. Globally, climate change is causing conflict, uncontrolled migration, habitat and species loss, changing patterns of human disease, drought, fires, floods, food insecurity and starvation, loss of essential aquifers and potable water as well as heat in the tropics so intense as to render outdoor labour impossible. Melting of glaciers in southeast Asia threatens the lives of 2 billion people over the coming century., Climate scientists warn of tipping points in earth's climate system resulting in stepwise and rapid escalation of climate impacts., Australia is not immune to climate change impacts, with extreme weather on display in recent years. As the State of the Environment Report 2022, produced by the Bureau of Meteorology and the CSIRO, stated: 'Observations, reconstructions of past climate and climate modelling continue to provide a consistent picture of ongoing, long-term climate change interacting with underlying natural variability. Associated changes in weather and climate extremes— such as extreme heat, heavy rainfall and coastal inundation, fire weather and drought—have a large impact on the health and wellbeing of our communities and ecosystems. These changes are happening at an increased pace—the past decade has seen record-breaking extremes leading to natural disasters that are exacerbated by anthropogenic (human-caused) climate change.' While there has been a steady and gratifying decline in emissions from the electricity sector, transport emissions have rebounded following the early COVID-19 period. Transport emissions now account for about 19% of all emissions in Australia. Australia will be unable to meet its climate commitment of 43% reduction of emissions on 2005 levels by 2030 without strong action in the transport sector. A fuel efficiency standard is an important step but must be accompanied by a major investment in public transport, active transport and urban planning. It is disturbing to note that almost all of the media coverage of the fuel efficiency standard

	disregards the climate emergency and health consequences of an over-reliance on motor vehicles.
Who should the regulated entity be? (optional, 3000 character limit)	NULL