



# Organisation questionnaire response

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

<b>What organisation do you represent?</b>  (required)	Europcar
<b>What is your name?</b>  (required)	Emilie Mayeux
<b>What is your position at the organisation?</b>  (required)	EV project Manager
<b>Please rank the proposed options in order of preference.</b>  (optional)	Option A - 3rd, Option B - 1st, Option C - 2nd
<b>Briefly, what are your reasons for your choice?</b>  (optional, 3000 character limit)	<p>Europcar commends the Federal Government for taking this critical step towards driving down fuel bills and vehicle emissions. Only Options B and C are consistent with the government’s climate targets, and we therefore do not support Option A. Europcar supports Option B as it has the highest benefit-cost ratio, while remaining aligned with the nation’s climate targets. The substantive design and overall carbon abatement delivered by Option B should be viewed as a minimum floor concerning any future reviews and/or changes to the standard’s design.</p> <p>Additional reasons Europcar supports Option B include: - It is technology-neutral, enabling car makers to choose a mix of powertrains to achieve the targets.</p> <ul style="list-style-type: none"><li>- It includes feasible efficiency improvement pathways for both passenger cars and light commercial vehicles, that will increase vehicle choice, lower fuel costs and reduce emissions.</li><li>- It minimises loopholes through the exclusion of technology credits.</li><li>- It recognises diversity in vehicle sizes through the inclusion of a mass limit curve while adding breakpoints to minimise the incentive to sell heavier vehicles, and the disincentive to sell lighter vehicles.</li><li>- It includes banking and trading of credits over an appropriate 3-year period.</li><li>- It includes a globally-competitive penalty rate to encourage car makers to trade credits, and ultimately drive the market towards a more efficient mix of vehicles for Australian households and businesses.</li></ul>



	<p>Europcar views a start date of 1 January 2025 as appropriate and feasible. Any changes made to Option B should not reduce the overall carbon abatement forecast under all time horizons included in the government’s impact analysis. Europcar supports three additional key actions recommended by the Electric Vehicle Council (EVC) to further accelerate the supply of low and zero-emission vehicles:</p> <ol style="list-style-type: none"> <li>1. Immediately commit to allowing the direct acceptance of type-approved low/zero-emission vehicles from major global markets in full volume supply. This reform is critical for ensuring car makers can bring global models to Australia as quickly as possible. Unique Australian standards that are not consistent with similar international markets (EU, US, Japan), increase the regulatory burden and cost of importing new models and will slow our transition to a more efficient vehicle fleet for no demonstrable increase in safety.</li> <li>2. Work with states to address the premature withdrawal of consumer incentives for EVs. Collectively, Australian governments need to continue to actively support EV adoption until sales approach 30% of new vehicles – in line with international experience. These incentives should be targeted and could be means-tested - similar to the Queensland ZEV rebate. Explore opportunities to support mechanics, car dealers and other service providers as Australia transitions to a zero-emission vehicle fleet over the coming 25 years. This could include skills &amp; training support, investment in infrastructure, etc.</li> </ol>
<p><b>Do you support the Government's preferred option (Option B)?</b>  (optional)</p>	<p>Yes</p>
<p><b>Do you have any feedback on the analysis approach and key assumptions used?</b>  (optional, 3000 character limit)</p>	<p>Europcar is supportive of the overall analysis approach documented in the government’s impact analysis, including the key assumptions. In reviewing the assumptions, some could be considered conservative, however, this is appropriate given future uncertainties. It would not be appropriate for the government to speculate on the future cost of credits traded in this scheme as that would be an interference with the market mechanism proposed. Once established, the technology-neutral standard provides an efficient, market mechanism for car makers to trade credits, which will help to increase competitive tension in the supply of more efficient vehicles to Australia, and ultimately deliver the policy’s intended outcomes of lower fuel bills for Australian households and businesses, while reducing emissions from the transport sector.</p> <p>The Electric Vehicle Council has noted that from international experience credits are generally traded at around 40-50% of the penalty rate and that car makers rarely pay the full penalty rate due to the standard encouraging trading of credits.</p> <p>Scare campaigns based cherry-picking the most emissions-intensive variants of vehicle models to calculate a so-called ‘tax’ using the full</p>



	<p>penalty rate is not only blatant misinformation and deceptive, but misrepresents how these standards operate around the world. As outlined in the government’s impact analysis, and also stated by the Electric Vehicle Council, there is no evidence from overseas to show that efficiency standards lead to an increase in vehicle purchase prices.</p>
<p><b>Briefly, describe how the NVES might impact your organisation</b>  (optional, 3000 character limit)</p>	<p>The introduction of the NVES will provide significant benefits including lower fuel costs, reduced emissions, improved air quality, and increased energy independence. The NVES will support an increase in low and zero-emission vehicles over the coming years. This is important to Europcar because:</p> <ul style="list-style-type: none"> <li>- We believe in a greener and sustainable mobility.</li> <li>- Changing mindsets requires some educational measures. It should also be noted that the NVES acts as a strong global policy signal that makes Australia a more attractive destination for investment in the local low and zero-emission vehicle industry and associated value chain.</li> </ul> <p>For example, the NVES will play an important role in providing investment certainty for supporting the rollout of zero-emission vehicle charging infrastructure and will help to inform expected demand for upskilling within specific industries, by providing clarity on the future trajectory of the transport sector.</p>
<p><b>Who should the regulated entity be?</b>  (optional, 3000 character limit)</p>	<p>Europcar agrees with the government’s proposed approach for the regulated entity to be the type approval holder who first enters a particular vehicle onto the Register of Approved Vehicles (RAV). This will assist with aligning regulation of the standard with the existing regulatory system for importing vehicles in Australia. It is critical that the regulatory components of the standard are established as soon as possible, including related IT systems. We agree with government’s approach to engage with industry ASAP to support the development of, and integration with these systems.</p> <p>It is not acceptable for the start of the standard to be delayed beyond 1 January 2025. It is critical the regulation is in place as soon as possible to start driving down new vehicle emissions, given this is one of the primary levers being used to reduce transport emissions over the coming decades, in line with our climate targets. The standard is also critical for addressing Australia’s current cost of driving crisis where households and businesses are using significantly more fuel than consumers in overseas markets that already have strong efficiency standards. Finally, Europcar recommends the government publish the full results of the standard each year to provide transparency on how different car makers are performing, and how the market as a whole is performing.</p> <p>Related to this, given government will be collecting import/sales data on new vehicles, careful consideration should be made to how this</p>



data could be leveraged more broadly to support national low and zero-emission vehicle policy and planning, as well as industry development. Further development of a publicly-available vehicle sales dashboard – similar to what New Zealand currently has – would be highly beneficial: <https://www.nzta.govt.nz/vehicles/how-the-motor-vehicle-register-affects-you/motor-vehicle-registrations-dashboard-and-open-data/>. The lack of publicly available vehicle sales data in Australia currently inhibits policy, planning and industry development, and can be rectified as a co-benefit of introducing the standard.