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Sent: Friday, 4 October 2024 10:12 AM
To: CleanerCars
Subject: submission to: Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024 [SEC=OFFICIAL]

Submitted on 4 October 2024

Submitted by: Anonymous

Submitted values are:

Step 1: Your submission

Remain Anonymous

No

Private Submission

No

Published name

Ben S

Short comment

I am writing in response to the consultation on the proposed exemption determination for vehicles that do not have an Australian light vehicle CO2 test under Australian Design Rule (ADR) 81/02. My concern relates to the treatment of large trucks and utility vehicles (utes), which are now among Australia's best-selling vehicles but are often excluded from the same scrutiny applied to passenger cars.

Key Concerns

1. Changing Use of Large Trucks and Utility Vehicles

In Australia, large trucks and utes, such as the Toyota Hilux and Ford Ranger, are no longer solely used for commercial or industrial purposes. They have become mainstream vehicles for personal transport, frequently used as family cars, for commuting, and for recreational activities. Despite this shift, these vehicles are often subject to less stringent emissions standards than traditional passenger cars. This creates an inconsistency in the regulatory framework, especially since utes and trucks contribute significantly to overall vehicle emissions.

2. Higher Emissions and Fuel Consumption

Large trucks and utes generally produce higher CO2 emissions and consume more fuel than smaller passenger cars. Given their widespread use, treating them differently in terms of emissions testing or allowing them exemptions under ADR 81/02 risks undermining Australia's efforts to reduce vehicle emissions. The high market share of these vehicles means that excluding them from the same emissions requirements as passenger cars could lead to a substantial gap in emissions reductions.

3. Impact on Road Safety and Rising Road Toll

Australia's road toll has been rising, and large trucks and utes pose a greater risk to other road users, particularly pedestrians and cyclists. Their size, weight, and design make them more dangerous in collisions compared to smaller cars. If these vehicles continue to be incentivised through lenient emissions standards, their prevalence

on the roads will increase, potentially exacerbating the road toll. The proposed policy, by incentivising the sale of these larger vehicles, inadvertently contributes to a higher risk on the road, worsening safety outcomes for vulnerable road users.

4. Encouraging Cleaner, More Efficient Vehicles

Including large trucks and utes in the same emissions framework as passenger cars would incentivise manufacturers to invest in cleaner, more efficient technologies. By applying consistent CO2 emissions testing under ADR 81/02, Australia can encourage the development of hybrid, electric, or more fuel-efficient models in these popular vehicle categories. This would contribute to lowering overall vehicle emissions and promote a more sustainable transition for the Australian vehicle fleet.

5. Public Health and Air Quality

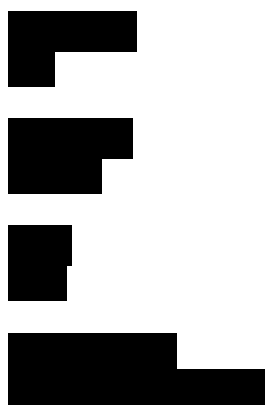
Utes and trucks that are excluded from emissions testing may emit higher levels of harmful pollutants, such as nitrogen oxides (NOx) and particulate matter, contributing to air pollution in urban areas. Given their increasing use in cities and suburbs, failing to address their emissions could worsen air quality and lead to adverse public health outcomes. Ensuring they undergo the same CO2 testing as passenger vehicles is crucial to mitigating these risks.

Recommendations

- **Equal Treatment of Large Trucks and Utes:** I urge the government to ensure that large trucks and utility vehicles, particularly those used for personal transport, are subject to the same emissions testing requirements as passenger cars under ADR 81/02. This would close any potential loophole and reflect the reality of how these vehicles are now used.
- **Stronger CO2 Standards to Mitigate Safety Risks:** The government should consider the road safety implications of allowing an increasing number of large trucks and utes on the road. The proposed policy could inadvertently incentivise their continued growth in the market, increasing the risk to other road users. Ensuring that these vehicles are subject to stringent emissions standards would not only support environmental goals but could also act as a deterrent to their rapid proliferation, thereby reducing the risks they pose to road safety.

In summary, large trucks and utility vehicles, given their widespread use in everyday life, should not be exempted or treated differently from passenger cars when it comes to CO2 emissions testing. By including them in the same regulatory framework, Australia can better align its vehicle standards with its environmental objectives, reduce the carbon footprint of the nation's vehicle fleet, and enhance road safety for all users.

Step 2: Contact details



Email notification

CleanerCars@infrastructure.gov.au

Consultation name

Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024