

**From:** Department of Infrastructure, Transport, Regional Development, Communications and the Arts <infrastructure.noreply@govcms.gov.au> on behalf of infrastructure.noreply@govcms.gov.au  
**Sent:** Monday, 7 October 2024 10:07 PM  
**To:** CleanerCars  
**Subject:** submission to: Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024 [SEC=OFFICIAL]

Submitted on 7 October 2024

Submitted by: Anonymous

Submitted values are:

## Step 1: Your submission

### Remain Anonymous

No

### Private Submission

No

### Published name

Brad Pettitt

### Short comment

Thank you for the opportunity to provide the following brief submission on the New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024.

The primary issue I want to give feedback on is the New Vehicle Efficiency Standard (NVES) exemptions. I am strongly concerned that several popular makes and models of light commercial vehicles ) are not being tested for CO2 emissions. This includes vehicles such as Chevrolet Silverado, Ford F150 and F250, and the RAM 1500 and 2500 pickups each of these vehicles have a gross mass between 3.5 and 4.5 tonnes which unfortunately exempts them from the NVES scheme.

To ensure integrity in the scheme and set Australia on a pathway to zero emission transport, this unfortunate anomaly must be addressed immediately. These vehicles are being sold in increasingly large numbers and unless this anomaly is addressed there will be a perverse incentive to buy more of these which will push Australia's emissions reduction targets even further off course.

When fuel consumption labeling was introduced in 2001, it required vehicles up to 2,700 kg to be tested for CO2 emissions for the fuel efficiency label. ADR 81/01 increased this limit to 3,500 kg to include a greater range of vehicles in the scheme. This exemption creates a perverse incentive for a SUV loophole, particularly as importers of these large vehicles are marketing them so aggressively. AEVA All vehicles using public roads should ideally be tested for CO2 tailpipe emissions.

The Australia Electric Vehicle Association (AEVA) have stated some important context that is worth sharing: "Experience with the US CAFE standard brings some important lessons for the NVES. The CAFE standard originally contained an exemption for vehicles over 6,000 pounds and was later revised to 8,500 pounds (3,850 kg). This provision, now widely known as the "SUV loophole", created an incentive for manufacturers to increase the mass of vehicles that were close to this threshold. Using weight as a determinant for NVES exemption risks creating a

similar incentive in Australia for manufacturers to increase vehicle mass to avoid their obligations under the NVES. It will also delay the introduction of electric variants in this key segment of the market. that the Australian Government must not repeat this mistake.”

I agree with the AEVA recommendation for a short but fair timeframe for the importers to undertake CO2 tests on vehicles with no previous test result and their suggestion that doing so by 1 March 2025 would be reasonable.

Finally, I would like to support the position of Leader of the Australian Greens, Adam Bandt MP, who said : ‘the government needs to set electric vehicle targets and get moving on implementing strong fuel efficiency standards”

Thank you for the opportunity to submit on this important matter.

## Step 2: Contact details

**First name**

Brad

**Last name**

Pettitt

**Organisation (if applicable)**

Parliament WA



**Email notification**

CleanerCars@infrastructure.gov.au

**Consultation name**

Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024