



**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:** Wednesday, 2 October 2024 2:06 PM  
**To:** CleanerCars  
**Subject:** submission to: Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024 [SEC=OFFICIAL]  
**Attachments:** nves-ineos-automotive-australia\_0.pdf

Submitted on 2 October 2024

Submitted by: Anonymous

Submitted values are:

## Step 1: Your submission

**Remain Anonymous**

No

**Private Submission**

No

**Published name**

INEOS Automotive Australia

**Short comment**

We request the exemption of NB1 (Medium goods carrying) vehicles from the NVES standard, as Australia's diverse landscape and consumer use cases require these purposeful vehicles with off-road capability to meet needs that low or zero-emission vehicles cannot currently address.

## Upload attachments

**File uploads**

- [nves-ineos-automotive-australia\\_0.pdf](#) (109 KB)

## Step 2: Contact details



**Organisation (if applicable)**

INEOS Automotive Australia



**Email notification**

CleanerCars@infrastructure.gov.au

**Consultation name**

Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024

## INEOS Automotive - Response to NVES exemption consultation

INEOS Automotive is the only new scale-OEM established in Europe in this century. After starting to deliver our first vehicles with internal combustion engines at the very end of 2022, we are now focussing our investments on low and zero emission vehicles while navigating the unprecedented complexity and uncertainty that the automotive industry faces.

Our first two vehicles, the INEOS Grenadier and Quartermaster both have a ladder frame, front and rear solid axles, up to three differential locks and low gears with payloads exceeding 680kg. These attributes are becoming increasingly rare, but are essential for critical emergency services, defence and for working vehicles accessing remote areas. This core use case for INEOS vehicles necessitates a combustion engine.

We welcome the possibility to engage with the government, industry associations and other OEMs during the industry consultation sessions. The opportunity to work together and to provide feedback and discuss draft future regulations is the best way forward in a rapidly changing and challenging industry such as automotive. As such, we would like to express our concern about the recent update in the NVES exemption criteria namely, the inclusion of NB1 category vehicles.

NB1 category vehicles tend to serve purpose beyond passenger mobility. As good carrying vehicles there is a range of use cases that is yet to be adequately supported by zero emission goods carrying vehicles. In the case of INEOS, these goods carrying capability is augmented with extreme off-road capability. Therefore, in a vast geography with a broad range of arduous terrain, INEOS vehicles are providing mobility into environments whereby zero emission infrastructure does not exist. Often they are extensively modified to suit very specific use cases, resulting in significantly varied performance from one vehicle to the other. Further, when considering that this NB1 category of vehicle only represents a tiny fraction of total annual vehicle sales, these factors had lead to this category being currently exempt from some of the common light vehicles regulations and it is important that this will continue to be the case under the NVES framework.



In the recent face-to-face meetings held in Canberra, INEOS Automotive presented a meticulous exemption proposal for NB1 (off-road category vehicles), outlining the stringent homologation standards applied to this category. Vehicles specifically providing attributes such listed below:

- Payload exceeding 680kg (classified as good carrying)
- A robust ladder chassis
- Permanent four-wheel drive
- Live solid beam axles
- Differential locking
- Class-leading front and rear axle load limits
- Generous ground clearance
- Towing capacity of 3.5t
- GCM of 7t

INEOS Automotive is committed to delivering a specialised NB1 utilitarian vehicle to the Australian market.

We maintain that the original draft exemption, distributed on August 9<sup>th</sup> 2024, was in our opinion the correct path to proceed down. By extending the exemption to vehicles above 3,500kg that do not require compliance to ADR81 (Light passenger vehicle emission standard).

The updated proposed amendment of ADR 81/02 to incorporate vehicles that have used alternate standards to comply with ADR 80/04 that are being excluded from the exemption is a case of the department inconsistently circumventing 81/02 applicability.

Our objection to the blanket exemption approach is multifaceted.

1. It unjustly disadvantages purpose-built working vehicles that carry heavy loads and undergoing upgrades to suit operators specific use cases
2. Vehicles designed and built by INEOS are generally subject to extensive modifications to suit specific operator application (e.g. Agricultural & emergency services). This leads to a very wide range of body shapes, weights



and performances characteristics over which the vehicle manufacturer has limited (if not zero) control.

3. Vehicles that are in this category due to the level of modification may vary in actual CO2 emissions - As a result, including these in the NVES scheme will lead to an excessive challenge in terms of both certification and monitoring, as each conversion may have different fuel efficiencies and performance.
4. Unfair situation where some NB1 vehicles will be subject to NVES and others won't, purely based on the certification pathway some OEMs pursued outside Australia.

INEOS Automotive ensures our vehicles comply with all the standards under ADR and all current vehicle emissions for the category.

Citing the precedent set in New Zealand, where NB1 vehicles were excluded with exemptions during active scheme periods, we fervently advocate for a comprehensive review to exclude NB1 vehicles from the NVES standard, especially in the initial stages. Given that NB1 vehicles are mostly driven in remote areas and constitute a low-volume category when compared to the significantly larger Passenger segment, it would be inequitable to subject them to the same NVES scheme requirement.

In light of the foregoing, we respectfully request a thorough review with a view to exempt NB1 vehicles from the NVES standard. Or, at the very least, exclude them during the initial phase.

INEOS Automotive's mission is to deliver best in class off-road products that cater specifically to the needs of specialised usage and operations. We firmly believe that this exemption will enhance industry's ability to better serve vehicle owners in these targeted sectors.

We express our deepest appreciation for the opportunity to provide our feedback. Similarly, we remain available to discuss our request in greater detail at any convenient time and look forward to a favourable resolution.

