4 March 2024



Grain Producers SA Ltd

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Department of Infrastructure, Transport, Regional Development, Communications and the Arts GPO Box 594 CANBERRA ACT 2601

By email: via 'Have Your Say'

Submission re: New Vehicle Efficiency Standard

To whom it may concern,

I write regarding the final design and proposed implementation of Australia's New Vehicle Efficiency Standard (NVES), and the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (The Department) request for submissions.

Grain Producers SA (GPSA) is the peak industry body representing the 4,500 grain farming businesses in South Australia who plant more than 4 million hectares of cereals, pulses, and oilseeds annually. South Australia produces an average of 7.9 million tonnes of grain each year, which contributes more than \$4 billion to Australia's gross food revenue. This is made possible by grain growing businesses and farming communities across the state.

GPSA appreciates the opportunity to provide a submission to the options the Department has considered, as well as the Government's preferred design. We support efforts towards the control of solid and liquid fraction particulate emissions, including carbon dioxide emissions, but appeal for effective mechanisms rather than commercialised retrofit devices or unsafe engineered responses to changing legislation.

Light commercial vehicles (LCV) up to 4.5 tonnes gross vehicle mass (GMV) play an important role for grain producers, predominantly for those travelling long distances between farming operations. Driving LCVs from public roadways directly to access lands that are farmed has long been an acceptable practice.

As has been more recent experience driving an LCV fitted with a catalytic converter or diesel particulate filter (DPF) driving through dry grass and crops has become hazardous. The DPF system is hot and periodic regeneration causes dry vegetation to combust¹. It is noted that several LCVs have been recalled due to a potential fire hazard in the exhaust system ². GPSA believes the DPF is an example of the problems to be avoided or addressed before the Department and the Government bring in foreign Euro 6d standards that have less regard for safe LCV operation on farms in South Australia.

¹ https://www.abc.net.au/news/2023-05-29/outback-car-fire-risk-increased-after-wet-season/102378446

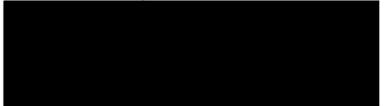
https://www.toyota.com.au/support/dpfinformation#: "text=Diesel%20Particulate%20Filter%20(DPF)%20manual, from%20February%202019%20and% 20Granvia

In developing legislation, GPSA notes the Department says detailed work will be done to identify those vehicle types that should be exempted from a NVES. The 'Cleaner, Cheaper to Run Cars: The Australian New Vehicle Efficiency Standard Consultation Impact Analysis Paper' assumes that heavy vehicles and vehicles subject to heavy vehicle emissions tests (i.e. large freight trucks), military vehicles, law enforcement vehicles, emergency service vehicles, agricultural, construction or mining equipment, motorhomes, horse trucks and motorcycles, would be exempt, and that it is intended to capture vehicles under the new NVES to those sold to the general public.

GPSA recommends commercial vehicles including LCVs when purchased new or second hand, i.e. vehicle types attracting a South Australian primary producer registration rebate³, should be exempted from a NVES. These vehicles for their usable life would be exempted from NVES requirements regardless of registration category.

Thank you once again for the opportunity to provide feedback on a new vehicle efficiency standard, and we look forward to innovative low and zero emission technology solutions that can also provide safe LCV operations in the future.

Yours sincerely,



Brad Perry CHIEF EXECUTIVE OFFICER GRAIN PRODUCERS SA

³ https://www.sa.gov.au/ data/assets/pdf file/0011/15212/MR21-Application-for-vehicle-concession-primary-producer-or-outer-areas.pdf



Organisation questionnaire response

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

What organisation do you	Grain Producers sa
represent?	
(required)	
What is your name?	Brad Perry
(required)	
What is your position at the	Chief Executive
organisation?	
(required)	
Please rank the proposed options	Option A - 0th, Option B - 0th, Option C - 0th
in order of preference.	
(optional)	
Briefly, what are your reasons for	See attached submission
your choice?	
(optional, 3000 character limit)	
Do you support the Government's	NULL
preferred option (Option B)?	
(optional)	
Do you have any feedback on the	See attached submission
analysis approach and key	
assumptions used?	
(optional, 3000 character limit)	
Briefly, describe how the NVES	See attached submission
might impact your organisation	
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(optional, 3000 character limit)	Construction to the test of the
Who should the regulated entity	See attached submission
be?	
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(optional, 3000 character limit)	