

4 March 2024



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

Grain Producers SA Ltd

Level 2, 180 Flinders Street Adelaide SA 5000
PO Box 7069 Hutt Street Adelaide SA 5000
P: 1300 734 884 F: 1300 734 680

ABN: 43 154 897 533

grainproducerssa.com.au

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 system². 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>

² [https://www.toyota.com.au/support/dpfinformation#:~:text=Diesel%20Particulate%20Filter%20\(DPF\)%20manual,from%20February%202019%20and%20Granvia](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 represent? (required)	Grain Producers sa
What is your name? (required)	Brad Perry
What is your position at the organisation? (required)	Chief Executive
Please rank the proposed options in order of preference. (optional)	Option A - 0th, Option B - 0th, Option C - 0th
Briefly, what are your reasons for your choice? (optional, 3000 character limit)	See attached submission
Do you support the Government's preferred option (Option B)? (optional)	NULL
Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)	See attached submission
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	See attached submission
Who should the regulated entity be? (optional, 3000 character limit)	See attached submission