GWM Australia proposes adopting option A as the regulations framework and making appropriate adjustments to certain aspects.

1. **Assessment Timing: It is suggested that assessments and penalties should commence three years after the formal publication of the regulations (i.e., in 2028), providing a transition period for enterprises engaged in the development of low/zero tail pipe emissions products.**

   Australia is implementing carbon emission regulations for the first time. Most new vehicle developments take between 3-6 years to complete suitable for the Australian market. If the assessment conducts in 2025, OEMs could not develop an adequate right-hand drive low/zero tail pipe emissions vehicles and finish all necessary testing and homologation work in less than 12 months.

   Other countries generally allocate around 2-3 years from the confirmation of the plan (draft release) to the formal implementation of CO2 regulations, providing OEMs enough time to develop new products.

2. **Industry Target Standards:** It is suggested the industry target values should adopt the NEDC as that is what the Australian consumer has grown accustomed to and understands (applicable to both passenger and commercial vehicles).
3. **Vehicle Target Value calculation Formula:** It is suggested to revise the passenger vehicle low and high inflection points to 1000kg and 2500kg respectively; for commercial vehicles, they should be revised to 1500kg and 2800kg.

   A linear formula should be adopted between the high and low inflection points.
4. **Encouragement Multipliers for low/zero tail pipe emission vehicles**: It is agreed to introduce encouragement multipliers for low/no tailpipe emission vehicles and to moderately relax requirements for MC/NA categories.

   It is suggested to adopt the FCAI algorithm, with below target values of 66%/33% as the standard, to receive encouragement multipliers of 1.5-2 times. ZEVs can receive encouragement multipliers of 2-2.5 times.

   MA multipliers ZEVs 2x, <33% of limit curve - 1.5x; MC/NA ZEVs – 2.5x, <33% of limit curve – 2x, <66% - 1.5x
5. **Low/zero tail pipe emissions Financial and Tax Policy Support:** It is recommended that the federal government introduce sufficiently robust subsidies and tax exemptions to support sales of these vehicles.

   It is suggested that the subsidy amounts reference the draft of the FCAI, with plug-in hybrid electric vehicles (PHEVs) receiving a subsidy of 6,000 Australian dollars and zero-emission vehicles receiving a subsidy of 8,000 Australian dollars.

   Countries such as China, the European Union, the United States, Japan, South Korea, and New Zealand, where the development of low/zero tail pipe emissions vehicles is progressing rapidly, have benefited significantly from robust financial and tax policies. Australia, however, lacks supportive policies, including vehicle purchase subsidies and tax exemptions. Merely assessing Original Equipment Manufacturers (OEMs) makes it challenging to swiftly and sustainably drive growth in the new energy vehicle market.
6. **External Circulation Technology and High-efficiency Air Conditioning Technology:** It is agreed to incorporate incentives for external circulation technology and it is suggested to develop a detailed list of encouraged technologies.
7. **Strengthening Infrastructure Development such as Charging Stations:** It is recommended the government to subsidize on expanding the current charging infrastructure, the entire power supply chain, and green electricity storage/production to feed this wave of vehicles driven by electricity.

Organisation questionnaire response

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

What organisation do you represent? (required)	Great Wall Motors Australia
What is your name? (required)	Wilson
What is your position at the organisation? (required)	Product Manager
Please rank the proposed options in order of preference. (optional)	Option A - 1st, Option B - 2nd, Option C - 3rd
Briefly, what are your reasons for your choice? (optional, 3000 character limit)	NULL
Do you support the Government's preferred option (Option B)? (optional)	No
Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)	NULL
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	NULL
Who should the regulated entity be? (optional, 3000 character limit)	NULL