



# Organisation questionnaire response

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

<b>What organisation do you represent?</b>  (required)	Greenpeace Australia Pacific
<b>What is your name?</b>  (required)	Joe Rafalowicz
<b>What is your position at the organisation?</b>  (required)	Campaigner, Electrify
<b>Please rank the proposed options in order of preference.</b>  (optional)	Option A - 3rd, Option B - 2nd, Option C - 1st
<b>Briefly, what are your reasons for your choice?</b>  (optional, 3000 character limit)	<p>The climate crisis should determine target strength. The NVES should set emission targets over a timeframe that reflects the urgency of the climate crisis. This requires a transition to all new car sales being zero emission vehicles (ZEVs) by 2035 at the latest. Option C and B are both acceptable as they would make that goal achievable, but option C is preferable as it ramps up faster, and has stronger targets. Moving faster will result in lower emissions and fuel savings for Australia over a longer period, compounding the benefits of the policy. The impact analysis estimates that by 2050, option C will reduce CO2 emissions by an additional 74 million tonnes, which will help the Government meet its climate targets in a context where other sectors face even greater challenges to reduce emissions.</p> <p>Targets are sufficiently distant for supply to catch up. Option C and B have the same starting target in 2025, which gives car companies two years to prepare for the stricter targets under option C (which only kick in from 2026 onwards). Two years is sufficient time for car makers to adjust their supply, given the number of ZEVs already on the global market and more under development. Car companies have known of the Government's intention to introduce some form of NVES since 2022, and 85% of the world is already covered by emissions standards, making this change foreseeable.</p> <p>If there is a short period where a number of the most polluting vehicles in Australia increase in price due to penalties under Option C, that can be managed through car companies buying credits from 100% ZEV car makers, further subsidising their price, and encouraging the overall shift. SUVs should be considered passenger vehicles. Option C and B rightly include SUVs in the passenger vehicle category. There is no justification for a higher CO2 limit for a vehicle that is larger due to</p>



	<p>consumer preference, rather than for a genuine utility or commercial reason (which is covered by the LCV category). The NVES should encourage lighter vehicles. The Government should consider lowering the break point for vehicles to 1800 kg or less, or better yet, eliminating the weight based adjustment altogether, to encourage the purchase of smaller, lighter vehicles.</p> <p>Penalties should be substantial. The EU has a penalty of \$197 per g/km (AUD equivalent) for exceeding their CO2/km target – to get close to that, the penalty proposed under option C should be adopted in Australia. Loopholes should be ruled out. Ruling out supercredits and loopholes are an excellent feature of both B and C. Banking and trading of credits is acceptable if limited in scope – these should not be expanded beyond the 2 years suggested by Option C. Emissions should be tested in real time. The Government should also implement real-world testing of vehicle emissions (onboard fuel consumption monitoring) to prevent manufacturers from producing laboratory testing which is inaccurate, as they have done in the past.</p>
<p><b>Do you support the Government's preferred option (Option B)?</b></p> <p>(optional)</p>	Yes
<p><b>Do you have any feedback on the analysis approach and key assumptions used?</b></p> <p>(optional, 3000 character limit)</p>	It appears that the cost benefit analysis uses a discount rate of 7% when considering future benefit. This understates the severity (and therefore negative utility) of the results of climate change beyond 1.5 degrees warming. It would have been helpful to see more detail about the assumptions regarding electricity prices and EV battery life.
<p><b>Briefly, describe how the NVES might impact your organisation</b></p> <p>(optional, 3000 character limit)</p>	NULL
<p><b>Who should the regulated entity be?</b></p> <p>(optional, 3000 character limit)</p>	NULL