

Consultation on the New Vehicle Efficiency Standard

March 2024

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Summary

Lung Foundation Australia are pleased to have the opportunity to respond and provide input to the consultation on the New Vehicle Efficiency Standard (NVES) - Cleaner, Cheaper to run Cars for Australia, held by The Department of Infrastructure, Transport, Regional Development, Communications, and the Arts. Australia continues to fall behind international standards for fuel and vehicles, being only one of two developed nations without an NVES in place. We note that Option B is the preferred option and that it too will create benefits for Australia, however we write in support of Option C as it is the option yielding the greatest benefits to the environment and the lung health of those living in Australia.

Air pollution and climate change pose a significant threat to the lung health of Australians, and those living with a lung disease or lung cancer are particularly vulnerable to the quality of the air they breathe. Across Australia residents are breathing polluted air resulting in significant negative health outcomes. Whilst Australia has relatively clean air, no level of air pollution is safe. We need to do more to support the one in three Australians living with a lung disease and protect the lung health of the community more broadly. It is important that the Government acts to reduce transport emissions and improve air quality for all Australians. We commend the Government for consulting on NVES and aiming to reduce transport emissions. Lung Foundation Australia remain committed to advocating for cleaner air to protect the lung health of all Australians.

About Lung Foundation Australia

Lung Foundation Australia is Australia's leading lung health peak body and national charity. Founded in 1990, we have become the trusted point-of-call for the 1 in 3 Australians living with a lung disease, including lung cancer.

We work to ensure lung health is a priority for all, from promoting lung health and early diagnosis, advocating for policy change, programs, and research investment, raising awareness about the symptoms and prevalence of lung disease, and championing equitable access to treatment and care. To support those living with a lung disease we deliver information and support services and facilitate access to peer support and exercise maintenance programs.

As a patient representative charity, we have partnered with patients, health professionals, researchers, medical organisations, and the Australian community to drive reform in the delivery of health services in Australia to benefit more than 7 million Australians impacted by lung disease and prevent even more Australians from developing lung disease.

The impact of transport emissions on lung health

Vehicle emissions are the combination of a range of air pollutants and in Australia they are one of the most widespread sources of anthropogenic (man-made) air pollution¹. Vehicle exhaust can have a severe impact on the health of Australians as exposure to fine particle pollution can cause coughing, wheezing, and a decrease in lung function^{2,3} and can lead to an increased risk of lung cancer, lung disease and asthma^{4,5}.

Additionally, vehicle emissions contribute to greenhouse gas and climate change which further exacerbates poor air quality. Climate change is one of the main contributors of air pollution, with greenhouse gases from the combustion of fossil fuels, and higher temperatures causing an increase in the presence of allergens and harmful air pollutants⁶. Climate change is leading to more frequent and severe heatwaves, wildfires, storms, and floods^{2,7}, which in turn leads to increases in harmful smoke and mould in the air and impacts the quality of air Australians are breathing.

Air pollution consists of many different chemicals and gases which can cause adverse effects on human health, making it a significant public health issue. There is no safe level of air pollution and exposure to even low levels of air pollution poses a threat to human health and increases the risk of illness and death from major diseases such as lung cancer, chronic obstructive pulmonary disease, and lower-respiratory infections (such as pneumonia)⁸. In 2019, air pollution was the fourth leading risk factor for death globally⁹. The estimated financial cost of premature deaths due to air pollution ranges from roughly \$11 billion to \$24 billion per year¹⁰.

Population groups, such as those living with pre-existing lung conditions, are more susceptible to the impacts of air pollution¹¹. In 2023 Lung Foundation Australia carried out a survey with people in Australia living with lung disease, including lung cancer¹². We found that the results of climate change are having a significant impact on people's lives, including the need for additional medical treatment and a reduction in quality of life. Road traffic vehicle emissions were one of the main air pollutants causing the greatest impact on their lung health, with 57% of respondents saying they were moderately to severely impacted by road traffic vehicle emissions.

"I rarely leave my home anymore for fear of poor air quality days, which cause me to have anxiety fear and stress which I never really had beforehand. I feel my quality of life has greatly reduced. I no longer participate in outdoor events and gatherings or exercise due to fear of an attack and not being able to get my breath and suffocating. I am a different person to who I was, I feel I have lost myself. People without lung diseases don't seem to understand."

"I am unable to do my daily walk along a road which has some inclines to challenge me where there is a lot of traffic because the traffic has increased and thus the car fumes."

"I cannot go out if there is smoke in the air without being impacted. Vehicle emissions affect me badly."

Recommendations

Lung Foundation Australia supports Option C as it is the option yielding the greatest benefits to the environment and the lung health of those living in Australia. The primary objective of Government action is to reduce CO2 emissions; therefore, Option C is the favourable option.

We understand that the Government prefers Option B as it is deemed more equitable, where all Australians can access the vehicles they need for work and leisure. However, we note that tackling climate change, is in itself, a step towards reducing health inequities, and further strategies can be explored to ensure equitable access and affordability. The environment has a significant impact on people living with respiratory disease and is a major underlying determinant of health¹³. Although climate change impacts everybody, certain populations are disproportionately vulnerable to the exposure and/or impacts of climate change.

Population groups, such as those living with pre-existing lung conditions, pregnant women, elderly, and children are more susceptible to the impacts of air pollution^{14,15,16,17}. As well as groups who are more vulnerable to the impacts of air pollution, there are groups who are unfairly impacted by poor air quality due to higher exposure. Some communities are more exposed to poor air quality than others because of where they live and/or work. It has been found that air pollution has a disproportionate impact on Aboriginal and Torres Strait Islander communities and socio-economically disadvantaged communities in Australia¹⁸.

In 2022 the United Nations declared that everyone has a right to a healthy environment, calling for member states to step up efforts to ensure their people have access to a clean, healthy, and sustainable environment¹⁹. Most of our lung disease community want to see action in this space, and 84% thought it was extremely important for government to develop a strategy with clear actions to reduce the level of air pollution and protect lung health.

To reduce emissions in an equitable way, we recommend the Government:

- 🌱 Subsidise electric vehicles.

Electric vehicles provide a range of benefits including reduced fuel costs and higher efficiency, less maintenance, fuel security, reduced traffic noise, air quality improvements and is overall much better for the environment.²⁰ We understand that a lack of charging infrastructure, choice, and high prices are significant barriers in the electric vehicles market²¹. We note the importance of initiatives and subsidies to encourage the purchase of electric vehicles, such as reducing costs to improve affordability and increasing education and awareness campaigns on the benefits of electric vehicles.

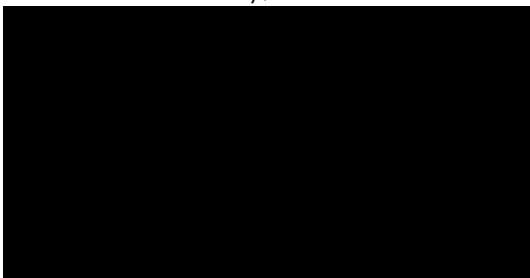
- 🌱 Invest in the improvement and promotion of public transport, walkability and cyclability.

Increasing the use of public and active transport has multiple benefits, including reducing carbon emissions, improving public health through increased passive and physical activity, and can be more equitable than private vehicle ownership^{22,23,24}. This aligns with The National Preventive Health Strategy 2021–2030²⁵ which recommends providing active transport networks as a way to support Australians increasing their physical activity levels.

We also understand that the Government are concerned that the rapid emissions reduction required under Option C risks providing insufficient time for the vehicle industry to adapt the technology offerings and vehicle supply to Australian consumers sufficiently to ensure the continued supply of vehicles Australians need. However, we emphasise that no level of air pollution is safe, and the Government must act swiftly to reduce emissions to benefit the health of the environment and Australians. We note that Option B and C will create benefits for Australia, however, as a health organisation, we favour Option C as the option generating the greatest health benefits and therefore net benefit to society. We note the importance of commencing NVES as soon as possible and for strong implementation of these standards to ensure industry acts and remains responsible for emission reduction.

Thank you for the opportunity to provide feedback.

Yours sincerely,



Mark Brooke
Chief Executive Officer
Lung Foundation Australia

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Organisation questionnaire response

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

What organisation do you represent? (required)	Lung Foundation Australia
What is your name? (required)	Lily Grigsby-Duffy
What is your position at the organisation? (required)	Policy and Project Officer
Please rank the proposed options in order of preference. (optional)	Option A - 3rd, Option B - 2nd, Option C - 1st
Briefly, what are your reasons for your choice? (optional, 3000 character limit)	NULL
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)	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