



Organisation questionnaire response

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

What organisation do you represent? (required)	Nature Conservation Council of NSW
What is your name? (required)	Jacqui Mumford
What is your position at the organisation? (required)	Chief Executive 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)	<p>The Nature Conservation Council of NSW (NCC) believes that all targets set in the New Vehicle Efficiency Standard (NVES) should reflect the urgency of the climate crisis. NCC believes it is imperative that Net Zero targets are met as soon as possible, meaning that we should prioritise a transition to all new car sales being zero emission vehicles by 2035 at the latest. NCC supports both Options B and C, though prefers Option C as the best choice for current and future Australians. To best support the Government in achieving Net Zero targets, and to allow breathing room for other sectors that face greater challenges in reducing emissions, NCC has a strong preference for the Option C target of reducing 74 million tonnes of CO2 emissions by 2050. We further support Options C and B because of their common starting target in 2025.</p> <p>NCC believes that the two years this provides to prepare for the stricter targets under Option C (which kick in from 2026 onwards) is sufficient time for car makers to adjust their supply. This is considering existing and developing zero emissions vehicles, and that 85% of the world is already covered by emissions standards. Furthermore, car companies have known of the Government's intention to introduce some form of NVES since 2022. Ensuring Australia has a strong fuel efficiency standard is so important for reaching a future with a cleaner, healthier transport system for everyone.</p> <p>NCC believes the federal government needs to urgently pass legislation that supports a clean future for Australian communities, children, and the environment, rather than letting self-interested car corporations maintain business as usual.</p>



	<p>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 consumer preference, rather than for a genuine utility or commercial reason (which is covered by the LCV category).</p> <p>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. 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>
Do you support the Government's preferred option (Option B)? (optional)	Yes
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