

Perth Hills Climate Change Interest Group Incorporated welcome the proposals put forward by the Commonwealth government to implement vehicle emissions standards which will reduce national greenhouse gas emissions and appreciate the opportunity for input. We offer the following comments:

- a. The New Vehicle Efficiency Standards (NVES) should set emissions targets that respond to the urgency of the climate crisis. A transition plan to ensure all new car sales are zero emission vehicles (ZEVs) by 2035 at the latest, is crucial in efforts to achieve national emissions reduction targets. Option C is our preferred option since it has stronger targets and has the potential to achieve targets more quickly. Option B however is acceptable.
- b. Moving faster will result in lower emissions and fuel savings for Australians 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, thus assisting the Government to meet its emissions reduction targets in an environment wherein other sectors face even greater challenges to emissions reductions.
- c. Options C and B have the same starting target in 2025, allowing vehicle manufacturers two years to prepare for the stricter targets under option C which commence from 2026 onwards. Two years is sufficient time for the industry to adjust their supply, given the number of Zero Emission Vehicles (ZEVs) already on the global market, with more under development. This change was eminently foreseeable given that manufacturers have known of the Government's intention to introduce some form of NVES since 2022 and 85% of the world has emissions standards already in place.
- d. If during the transition there is a period when some of the most polluting vehicles increase in price due to penalties under Option C, the additional cost can be offset by manufacturers utilising the option of buying credits from 100% ZEV car makers, further subsidising their price, and encouraging the overall shift to ZEVs. There is substantial evidence to show the cost savings to motorists in operating costs over the life of a ZEV.
- e. Options 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 simply due to consumer preference, rather than for a genuine utility or commercial reason, which is covered by the LCV category.
- f. The Government should consider lowering the break point for vehicles to 1800 kg or less, or ideally, eliminate the weight based adjustment completely, thereby encouraging the purchase of smaller, lighter vehicles.
- g. The EU has a penalty of \$197(AUD) per g/km for exceeding their CO2/km target. To incentivise the achievement of targets the penalty proposed under Option C should be adopted in Australia.
- h. Ruling out super credits and loopholes are excellent features of both Options B and C. Banking and trading of credits is acceptable if limited in scope, however these should not be expanded beyond the 2 years suggested by Option C.
- i. Finally, we propose that the Government should implement independent testing of vehicle emissions (onboard fuel consumption monitoring) to prevent manufacturers from producing inaccurate laboratory testing as has occurred in the past.



# 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)	Perth Hills Climate Change Interest Group Incorporated
<b>What is your name?</b>  (required)	Ailsa Paterson
<b>What is your position at the organisation?</b>  (required)	Secretary
<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)	Option C enables targets to be met more quickly
<b>Do you support the Government's preferred option (Option B)?</b>  (optional)	Yes
<b>Do you have any feedback on the analysis approach and key assumptions used?</b>  (optional, 3000 character limit)	Is consistent with external analysis and assumptions
<b>Briefly, describe how the NVES might impact your organisation</b>  (optional, 3000 character limit)	As a small organisation the new standards will not impact our organisation, but will have a strong positive impact on our environment and community
<b>Who should the regulated entity be?</b>  (optional, 3000 character limit)	No comment