



**TASMANIAN
CLIMATE
COLLECTIVE**

Tasmanian Climate Collective

Response to NVES consultation

Mar 2024

We applaud the Government taking this important step towards carbon neutrality.

Things we like about the Government's preferred Option B:

- Rules out Super Credits and Off-Cycle Credits.
- Adopts a higher standard of emissions than that preferred by auto manufacturers.
- Includes SUVs as passenger vehicles.
- Categorises vehicles according to mass not footprint.
- Brings the scheme on line in 2025.

Why we prefer Option C:

Australia is a late mover in this space, with much catching up to do. It is not sufficient to simply match US or European standards over time, we need to move much faster, to offset emissions we have **already** released by being slow to bring in climate warming abatement measures.

Overall, for all sectors, Australia's per capita emissions are well above those of any other country:

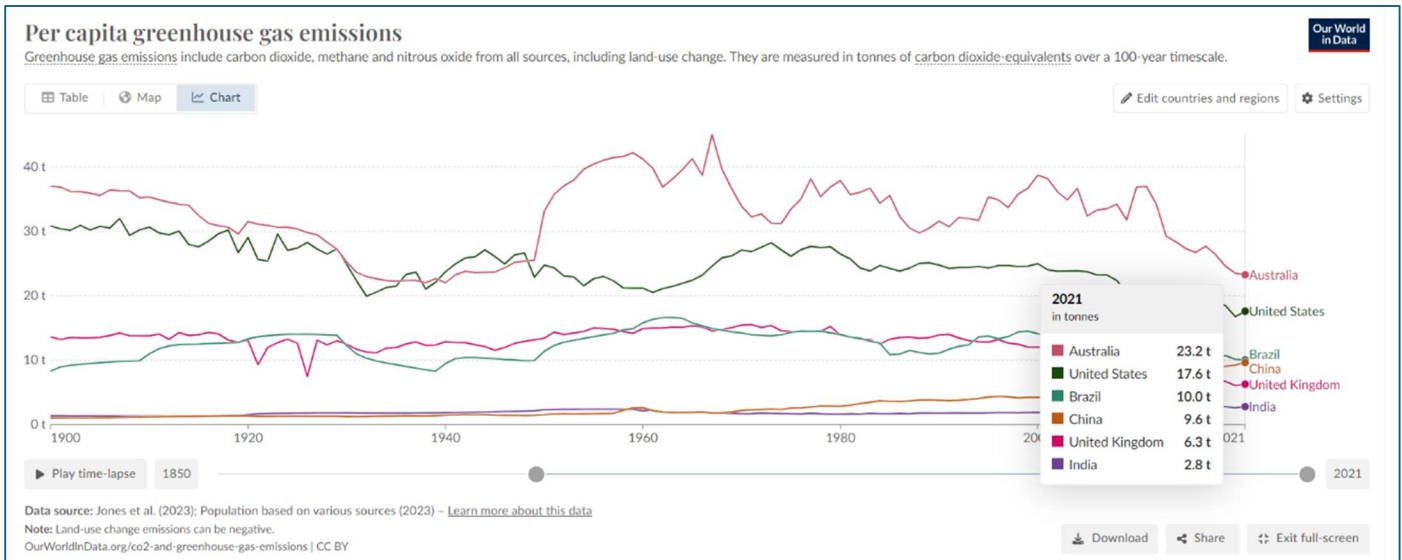


Figure 1: Per capital emissions for selected countries (source: Our World in Data)

In fact for a country with a relatively small population (barely 0.2% of world population), which has only become developed in the last 200 years, we've contributed many multiples of our cumulative share of GHG global emissions, and **continue to do so**:

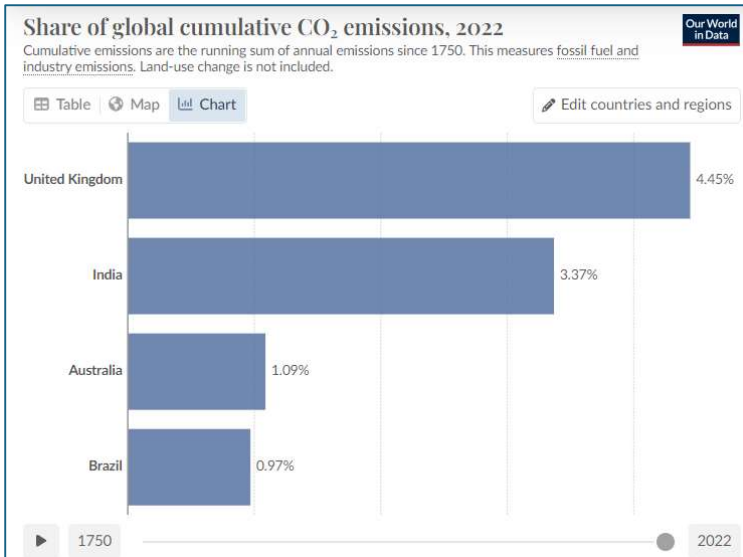
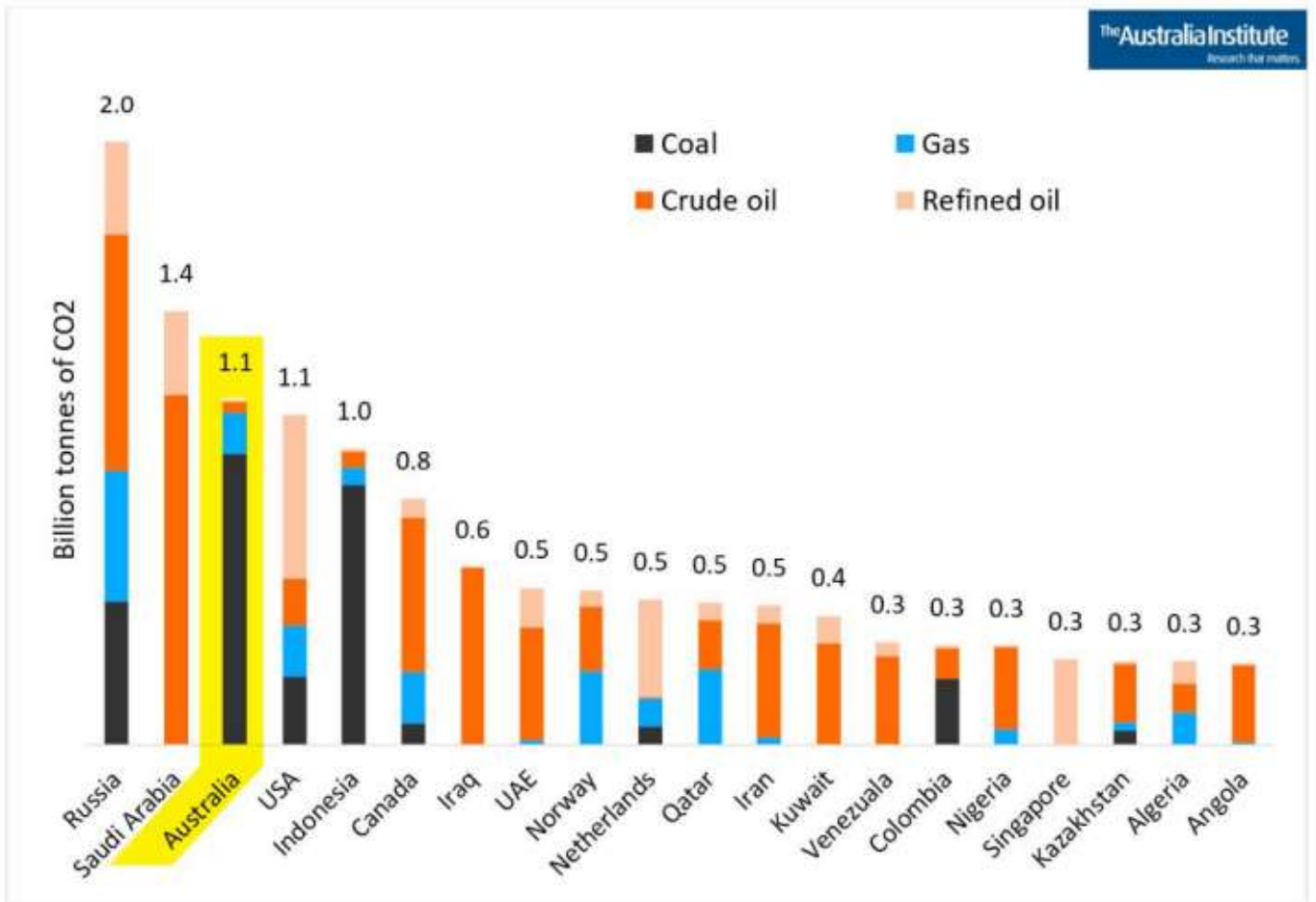


Figure 2: Cumulative emissions (excluding LULUCF) and annual emissions (including LULUCF). Source: Our World in Data

If we include Australia's **exports** of fossil fuel exports and their GHG potential when burnt, **Australia is one of the top 5 emitters in the world:**

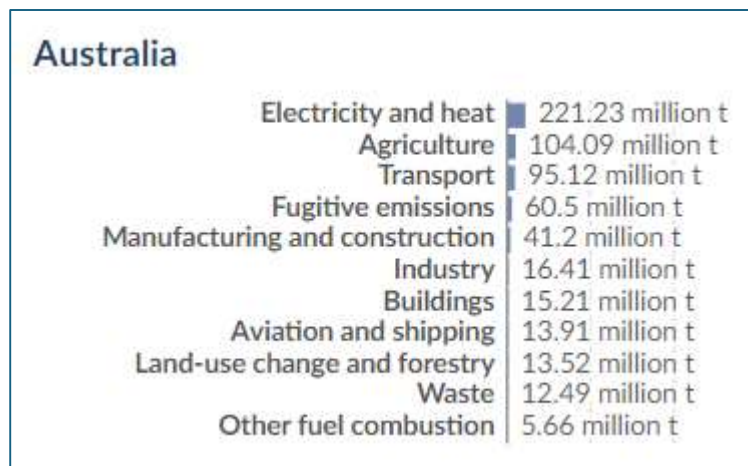
Figure: World's biggest fossil fuel exporters, CO₂ Gt potential of exports



Source: IEA (2018) *World Energy Balances*; IPCC (2006) *IPCC Guidelines*, as described in text; Commonwealth of Australia (2019) *Quarterly Update of Australia's National Greenhouse Gas Inventory for September 2018*

Figure 3: From: "High Carbon from a Land Down Under - Quantifying CO₂ from Australia's Fossil Fuel Mining and Exports", The Australia Institute, 2019

Our World in Data further reveals that Australia, with a population of around 25.6m, is producing around the same amount of GHG emissions from the **transport sector alone**, as the UK, a country with almost 3 times as many people:



United Kingdom	
Transport	97.04 million t
Electricity and heat	89.6 million t
Buildings	84.6 million t
Agriculture	50.03 million t
Manufacturing and construction	29.93 million t
Aviation and shipping	20.34 million t
Waste	16.63 million t
Industry	16.4 million t
Land-use change and forestry	12.8 million t
Fugitive emissions	8.29 million t
Other fuel combustion	5.8 million t

Figure 4: Australia and UK emissions by sector (source: Our World in Data)

Even given the tyranny of distance in Australia, this is still a shocking statistic. In fact cleaner forms of transport such as bus and rail, are **less** popular than 10 years ago:

Figure 1 Australia's National Passenger travel, 2022-23

Mode	Billion passenger kilometres	Change since previous year	Change since 10 years ago
Passenger Cars 	270	↑ 7.2%	↓ 0.7%
Buses 	16	↑ 38.7%	↓ 21.6%
Rail 	13	↑ 61.0%	↓ 12.6%
Air 	70	↑ 82.7%	↑ 0.5%
Other 	50	↑ 3.1%	↑ 22.0%
Total     	420	↑ 17.0%	↑ 0.3%

Source: BITRE estimates

Figure 5: Passenger kilometres by transport type (source: Bitre Yearbook 2023)

For the reasons above it is incumbent upon Australia to move **as fast and ambitiously as possible** when delivering policy changes relating to the reduction of GHG emissions.

The new proposed NVES is a great step forward, but it has only a limited impact, therefore any small incremental improvements are important. According to the *Department of Infrastructure's Yearbook 2023*, there were a total of 21.2 million vehicles registered in Australia during the 2022-23 financial year, and according to the *Federal Chamber of Automotive Industries*, 1.2 million new vehicles were purchased in 2023, the highest number on record, **amounting to approximately 5.7% of all registered vehicles**.

Toyota was the top selling car brand with 17.7 per cent of the market while the top selling vehicle was the Ford Ranger (63,356). SUVs and light commercials accounted for 78.4 per cent of sales and comprise all the top 10 vehicles sold in 2023.

Battery electric vehicles accounted for 7.2 per cent of sales with combined battery electric, plug-in hybrid and hybrid vehicles achieving 196,868 sales or 16.2 per cent of new vehicle sales.

Figure 6: Federal Chamber of Automotive Industries media release 4 Jan 24

Since electric and plug-in hybrid vehicles **already account for 16.2% of new vehicle sales**, the opportunity for the NVES is limited to the non-electric sales of new passenger and light commercial vehicles (the larger trucks, buses, motorhomes etc being currently excluded) – a further reason to move **fast and ambitiously**. The technologies already exist and are being sold into other countries, hence there is no reason to delay or not move to a more ambitious standard.

Other policy recommendations

We believe an ambitious NVES should be accompanied by other measures to amplify its effectiveness:

- Incentives and assistance for those in the regions and on low incomes, to trade in their older ICE vehicles for an EV. For instance, in Tasmania, the average age of vehicles is 13.21 years, compared to the national average of 11.25 years (*RecFIT's State of Play Report: Tasmania's Transport Sector*). Traded-in vehicles should be recycled to the highest extent.
- Scaled registration charges based on emissions and mass, as per the UK and some other countries. For instance in the UK, ZEVs pay no road tax (equivalent to our registration fee). There is also an additional charge in the UK for more expensive cars (eg a type of luxury tax).
- Mandatory annual roadworthy checks to include emissions testing, in all states.
- Commitment to rolling out a comprehensive vehicle charging network, including investment into cassette-type battery replacements for heavier vehicles.
- A nationwide commitment to comprehensive public (mass transit) infrastructure and incentives for mode-shifting, accompanied by assistance to states and councils to create active transport networks for cycling, walking, scooting and other forms of micro-mobility. It should be legislated that Land Use strategies at all levels should prioritise public and active transport over private cars. The following chart (using UK data) shows the huge GHG benefits of mode-shifting to mass transit for most journeys:

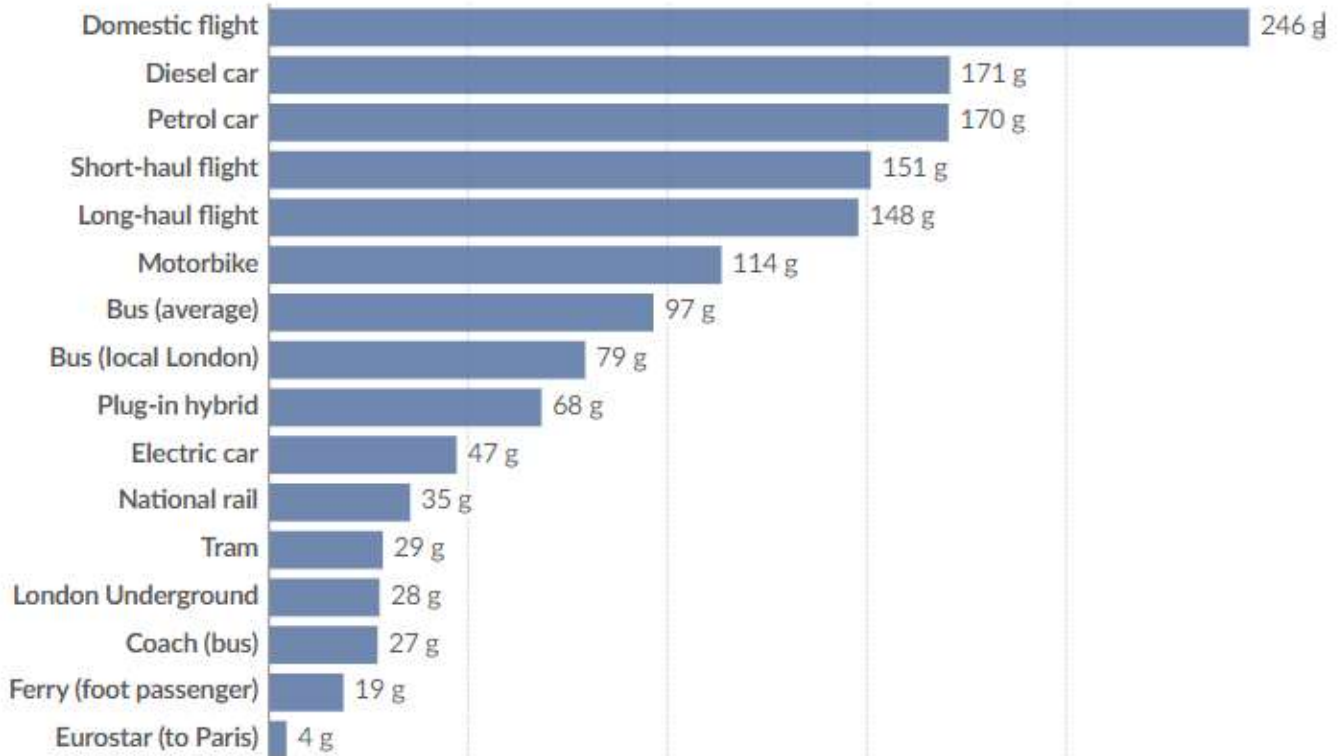
Carbon footprint of travel per kilometer, 2022

Our World
in Data

The carbon footprint of travel is measured in grams of carbon dioxide-equivalents per passenger kilometer. This includes the impact of increased warming from aviation emissions at altitude.

Table Chart

Edit countries and regions



Data source: UK Government, Department for Energy Security and Net Zero - [Learn more about this data](#)

Note: Official conversion factors used in UK reporting. These factors will vary across countries depending on energy mix, transport technologies, and occupancy of public transport. Data for aviation is based on economy class.

Figure 7: Source - Our World in Data

- Introducing a GHG tax on domestic air travel, which is by far the most energy intensive way to travel around Australia.
- A commitment to rolling out the NVES to heavy vehicles, motorhomes, horse floats and agricultural machinery over time, with assistance and incentives for owners to make the change.
- Encouraging the import of grid-connect EVs which can be used to help balance local grids and resolve the problem of renewable energy storage.
- Commit to stopping all new fossil fuel projects and forcing a higher percentage of renewable energy into electricity grids, with a view to achieving 100% renewable contribution by 2030. EVs and plug-in hybrids are far more GHG-efficient when charged on renewably-generated electricity.

[Tasmanian Climate Collective](#) (TCC) offers this submission in our ongoing efforts to support the copious, overwhelming scientific advice regarding the necessary actions required to mitigate climate change, transition our energy sources while avoiding energy poverty.

TCC is a group of committed organisations and individuals from across lutruwita, Tasmania who advocate for evidence based action on climate change. The Collective is made up of climate action, social and environmental groups and grassroots organisations. Tasmanian Climate Collective has no political affiliation and is composed of scientists, farmers, doctors, teachers, nurses and other concerned citizens calling for more action on climate change and a just transition for all Tasmanians.



Organisation questionnaire response

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

What organisation do you represent? (required)	Tasmanian Climate Collective
What is your name? (required)	Jenny Cambers-Smith
What is your position at the organisation? (required)	member
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)	please see attached
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)	please see attached
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	please see attached
Who should the regulated entity be? (optional, 3000 character limit)	please see attached