

4 March 2024

Director, Fuel Efficiency Standards—Surface Transport Emissions and Policy Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 2154
Canberra ACT 2601

Via email: cleanercars@infrastructure.gov.au

Dear Sir or Madam

Uber supports the introduction of a robust and ambitious New Vehicle Efficiency Standard (NVES) in Australia and supports the Australian Government's preferred Option B as outlined in *Cleaner, Cheaper to Run Cars: An Australian New Vehicle Efficiency Standard Consultation Impact Analysis*.

Uber has a global ambition to eliminate tailpipe emissions and become a zero-emissions platform by 2040. Promoting transition for high kilometre users, like rideshare drivers, can have an outsized impact in accelerating emission reduction and the transition to sustainable transport. One EV on Uber goes a long way, with EV drivers on the platform realising four times the emissions reduction benefits when compared to average car owners¹. In addition, EV rideshare supports community education on zero emissions transport. It provides an opportunity for drivers to talk to riders about what it's like to own an EV and how they deal with issues such as range anxiety.

In recent years Uber has launched a number of initiatives to support Uber driver-partners to make the switch to EVs. These include industry partnerships with [Splend](#), [EVSE](#), [BP Pulse](#) and [BYD](#), as well as \$26 million in our [incentives program](#). This has supported significant growth in EVs on the Uber platform and enabled us to launch [Uber Green](#) in 2023 and Australia's first fully electric rideshare product, [Comfort Electric](#), nationally in 2024. However, to continue reducing emissions and progressing towards our zero emissions target, we need to address one of the biggest barriers driver-partners tell us they face, the lack of affordable EV models in Australia.

Uber operates across 10,000 cities in 71 countries and globally we have seen that there is no better policy to drive volume and variety of Low and Zero Emission Vehicles (LZEV) to a market than an ambitious and robust CO2/Fuel Efficiency Standard on automakers. This is backed by research which has found that fuel efficiency standards are one of the most effective climate change mitigation measures to have been implemented over the past decade².

While Uber is focussed on working towards its 2040 zero emissions target, and are optimistic about the impact a NVES would have on affordable EV volume and variety in Australia, we also acknowledge the broader benefits from attracting more high efficiency internal combustion engine technology and hybrids. Fuel is one of the main

¹Jenn, A. 2020, Emissions benefits of electric vehicles in Uber and Lyft ride-hailing services. *Nat Energy* 5, 520–525 (2020).

<https://doi.org/10.1038/s41560-020-0632-7>

² The International Council on Clean Transportation, *Passenger Vehicle Greenhouse Gas Emissions and Fuel Consumption*, viewed 24 May 2023, <https://theicct.org/pv-fuel-economy/>

operating costs for Uber driver-partners. More fuel efficient vehicles are particularly important to high kilometre drivers reducing their costs over the lifetime.

Uber believes the Australian Government's preferred Option B, strikes the right balance between being ambitious, aligning us with the United States around 2028, while also being practical and achievable. The introduction of the NVES will provide significant benefits to all Australians including lower fuel costs, reduced emissions and improved air quality. It will also be a strong policy signal globally for investment in LZEV technology in this market.

If you require any further information about this submission or have any questions about Uber's sustainability program please do not hesitate to contact [REDACTED] or [REDACTED]

Yours sincerely,



Dom Taylor
General Manager, Mobility ANZ

Attachment A

1. **Please rank the proposed options in order of preference (optional):**

1. Option B
2. Option C
3. Option A

2. **Briefly, what are your reasons for your choice? (optional, 3000 character limit)**

The Australian Government's preferred Option B, strikes the right balance between being ambitious, aligning us with the United States around 2028, while also being practical and achievable. The introduction of the NVES will provide significant benefits to all Australians including lower fuel costs, reduced emissions and improved air quality. It will also be a strong policy signal globally for investment in low and zero emission vehicle technology in this market.

3. **Do you support the Government's preferred option (Option B)? (optional)**

Yes

4. **Do you have any feedback on the analysis approach and key assumptions used? (optional, 3000 character limit)**

No comment

5. **Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)**

Uber surveys of driver-partner attitudes towards EVs have for many years found that the lack of affordable EV models in Australia, is the number one barrier to making the switch. Uber operates across 10,000 cities in 71 countries and globally we have seen that there is no better policy to drive volume and variety of Low and Zero Emission Vehicles to a market than an ambitious and robust CO2/FES on automakers.

In addition, fuel is one of the main operating costs for Uber driver-partners. A NVES which also attracts more high efficiency internal combustion engine technology and hybrids will benefit driver-partners.

6. **Who should the regulated entity be? (optional, 3000 character limit)**

No comment



Organisation questionnaire response

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

What organisation do you represent? (required)	Uber
What is your name? (required)	Ashleigh Cormack
What is your position at the organisation? (required)	Head of Mobility Policy, ANZ
Please rank the proposed options in order of preference. (optional)	Option A - 3rd, Option B - 1st, Option C - 2nd
Briefly, what are your reasons for your choice? (optional, 3000 character limit)	The Australian Government's preferred Option B, strikes the right balance between being ambitious, aligning us with the United States around 2028, while also being practical and achievable. The introduction of the NVES will provide significant benefits to all Australians including lower fuel costs, reduced emissions and improved air quality. It will also be a strong policy signal globally for investment in low and zero emission vehicle technology in this market.
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)	No comment
Briefly, describe how the NVES might impact your organisation (optional, 3000 character limit)	Uber surveys of driver-partner attitudes towards EVs have for many years found that the lack of affordable EV models in Australia, is the number one barrier to making the switch. Uber operates across 10,000 cities in 71 countries and globally we have seen that there is no better policy to drive volume and variety of Low and Zero Emission Vehicles to a market than an ambitious and robust CO2/FES on automakers. In addition, fuel is one of the main operating costs for Uber driver-partners. A NVES which also attracts more high efficiency internal combustion engine technology and hybrids will benefit driver-partners.
Who should the regulated entity be? (optional, 3000 character limit)	No comment