

**Australian Transport Council / Environment Protection and Heritage Council –
Vehicle Fuel Efficiency Working Group**

**Vehicle Fuel Efficiency –
Potential measures to encourage the uptake of more fuel efficient, low carbon
emission vehicles.**

Submission Template

Name:

Company/Organisation:

Position:

Postal Address:

Phone number:

Fax number:

Email address:

Comment on the discussion paper is invited from interested stakeholders and members of the public. While comments are welcome on any aspect of the paper, readers are particularly asked to respond to the questions raised in Section 4 regarding the potential measures and in Section 7.

All submissions will be treated as public unless confidentiality is requested for all or part of the submissions. The Working Group requests, however, that the scope of any material requested to be kept confidential be limited to the minimum necessary.

Readers are encouraged to use this submission template as a basis for submissions. The Working Group has posed a series of targeted questions in order to provide a degree of consistency across submissions and to simplify the consideration of submissions. Readers are not required to complete the entire submission template. Comments on individual measures are welcome. Submissions in alternative formats will be accepted.

Electronic and handwritten submissions are welcome. A separate template for handwritten submissions is available from the Vehicle Fuel Efficiency Secretariat.

Contact details have been requested in case the Working Group needs to contact you to discuss aspects of your submission at a later date.

Please attach this coversheet to your submission and submit it to the Working Group via:

Email: vfedpaper@environment.gov.au

Fax: (02) 6274 1478

Phone: (02) 6274 1774

Post: Vehicle Fuel Efficiency Secretariat
Department of the Environment, Water, Heritage and the Arts
Renewables and Energy Efficiency Division (REED)
Energy Futures Branch
Technology and Transport Section
GPO Box 787
CANBERRA ACT 2601

General comments on a package of measures

1. Do you consider the actions of the type outlined in this paper are required, or are current arrangements sufficient?

Yes

2. If you consider further actions may be required, which measures, or package of measures, offer the greatest potential to cost-effectively reduce greenhouse emissions from the road transport sector?

Consideration for Plug in electric for commuter / short range travel.

3. In your view, are there particular combinations of measures that would enhance the potential benefits of the measures?

4. Are there barriers or challenges to the uptake of low emission transport technologies in Australia which have not been identified in this paper?

Bias against EV solutions.

5. Are there opportunities to improve vehicle fuel efficiency within the Australian road transport sector which have not been identified in this paper?

Yes, Plug in Electric.

6. Do you have views on possible social or economic impacts arising from measures outlined in this paper? How could these impacts best be managed?

7. General Comments

Section 3.1 paragraph one excludes plug-in electric vehicles as an uncertain technology in the long term. As short term is within the next 20 years, and there are already mass production plug in electric vehicles that are due to be released in 2010 by BMW, Volkswagen, Nissan, et al and currently such vehicles already in production such as Tesla USA & Lightning Cars UK, perhaps you need to refocus this paper on such relevant technologies. Battery technology such as freely available nano phosphate lithium ion (A123) is out there and viable right now.

Category 1 Measures to Increase the Supply of Low Emission Vehicles

1.1 CO₂ Emission Targets for New Light Vehicles

1. Do you consider there is a case for tightened CO₂ standards for the light vehicle fleet in Australia?

Yes, I believe older vehicles will need to be phased out or upgraded with tighter emission control systems. The technology is there to retrofit such systems, but realistically this would be too expensive for non-enthusiasts (it would be cheaper to upgrade the vehicle to a newer model)

2. If you consider tightened standards are required, should they be voluntary or mandatory?

Mandatory

3. Do you have a view about the design of any system – for example do you agree that the standard should be a sales-weighted average? Do you agree with the European Union proposal to link the standard to vehicle weight, or should it be based on different parameters?

Vehicle weight seems to be a valid basis

4. Do you consider that CO₂ standards can effectively operate independently of other measures, or are other measures critical to their success?

No comment

5. Do you consider that market pressures, such as rising fuel prices, will be sufficient to deliver significant CO₂ reductions from the light vehicle fleet, without the need for CO₂ standards?

No

6. General Comments

Category 2 Measures to Increase Demand for Low Emission Vehicles

2.1 Restructure State registration and stamp duty charges for light vehicles

1. Would a stamp duty differential charging scheme be an effective means of encouraging consumers to purchase more fuel efficient vehicles?

Yes

2. Would a registration differential charging scheme be an effective means of encouraging consumers to purchase more fuel efficient vehicles?

Yes, rather than weight, base the registration cost on actual emissions measured at registration test.

3. Of the range of basic system models outlined in Measure 2.1 of the discussion paper, which would be the most effective at improving vehicle fuel efficiency and most understandable to the average motorist?

No comment

4. What other considerations should be made in the design of any system?

Factor in modified vehicles, which may exhibit worse emissions levels than a standard vehicle.

5. General Comments

Category 2 Measures to Increase Demand for low emission vehicles

2.2 Provision of direct financial incentives/disincentives based on vehicle CO₂ emissions.

1. Do you consider that direct rebate for low emission vehicles are an effective measure in reducing CO₂ emissions?

No

2. If so, do you consider that the cost of rebates should be offset with higher fees on high emitting vehicles (i.e. a feebate scheme)?

3. Do you agree that any scheme should be based on CO₂ emissions and not linked to particular technologies?

Yes

4. If a scheme was to be introduced, would you support it being based on a single threshold, or do you support a range of “class” based thresholds? What do you consider are the advantages and disadvantages of such approaches?

No comment

5. General Comments

Category 2 Measures to Increase Demand for Low Emission Vehicles

2.3 Develop fleet purchasing frameworks that incorporate greenhouse reduction objectives

1. Do you consider fleet operators would be motivated to participate in a national fleet accreditation process to improve the fuel efficiency of their fleet?

If tax benefits were offered, yes (ie scrap tax concessions for non green fleets)

2. If you do, what benefits do you consider fleet operators would expect to result from participation in such a scheme?

Tax benefits

3. Do you think that an accreditation scheme should have the sole goal of reducing CO₂ emissions? Should additional goals be considered (such as air quality)?

Yes, No

4. Are you aware of fleet fuel efficiency schemes operating within Australia or overseas? Has there been an analysis of the effectiveness of these schemes?

No

5. General Comments

Category 3 Measures to Improve Consumer Awareness

3.1 Including Fuel Consumption Data in Vehicle Advertisements

1. Do you consider there is a case for including fuel consumption and CO₂ emissions data in vehicle advertising?

Yes

2. If so, what do you think would be the best way to implement it?

Tonnes of CO₂ per 100km (to cater for non Oil based fuels) – grid electricity powered vehicles would need a electricity supply cross-section figure updatable as supply characteristics change (every 4 years?)

3. Are there any matters not identified which would facilitate or impede the introduction of this measure? We are particularly interested in any published material you can point to.

Inclusion of plug-in EVs which go on sale next year:

<http://www.news.com.au/story/0,23599,24070715-5007133,00.html>

(to name just one)

4. What do you consider are the costs and benefits of the measure, and their likely magnitude? What is the basis of your views on this question?

Costs: rework of the vehicle labelling scheme
Benefits: public recognition of vehicle emissions

5. Are you aware of any other countries implementing similar measures, and whether there has been any analysis of their effectiveness?

No

6. General Comments

Category 3 Measures to Improve Consumer Awareness

**3.2 Standards / Labelling Requirements for Non-engine
Components Which Impact on Fuel Consumption**

1. Do you consider that measures in relation to non-engine components are worth pursuing?

Yes

2. Do you agree with the Working Group's assessment that Australia should move quickly to assess/establish within Australia any measures agreed to internationally?

Yes

3. General Comments

Category 3 Measures to Improve Consumer Awareness

3.3 Heavy Vehicle Environmental Rating Scheme

1. Do you consider there are gaps/inadequacies in the provision of heavy vehicle fuel efficiency data to business purchasers? Can you identify those deficiencies?

No comment

2. If deficiencies exist, what do you consider is the most effective way to address these? Do you consider there is a case for web-based fleet management tools, and how should they be funded?

3. What do you think would be the most important areas for any tools to address?

4. Are you aware of any other countries implementing similar measures and whether there has been any analysis of their effectiveness?

5. Are there any additional matters that would facilitate or impede the introduction of fleet management tools? We are particularly interested in any published material you can point to.

6. Do you think the development of fuel efficiency guides for fleets would be a cost effective means to reduce fuel use of heavy vehicles?

7. Do you consider there is a case for development of a heavy vehicle environmental rating scheme similar to the light vehicle rating scheme? Do you agree with the assessment that any scheme should wait for the finalisation of international emission measurement standards?

8. What do you think would be the most important areas for any scheme to address?

9. General Comments

Category 3 Measures to Improve Consumer Awareness

3.4 Establish a technology demonstration scheme for Australian road transport fleets linked to achievement of greenhouse outcomes

1. Do you consider a subsidy scheme to support the development and trial of emerging low emission technologies is necessary to encourage innovation within the light commercial and heavy vehicle market segments? If so, is it an effective approach?

No comment

2. Are there additional (non-financial) barriers to the adoption of proven and emerging low emission technologies within the light commercial and heavy vehicle segments?

3. Are you aware of any other countries implementing similar measures and whether there has been an analysis of its effectiveness?