Comments on *Light vehicle CO₂ emission standards for Australia*

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Q1 Do you support the setting of staged short and medium term targets?  Yes  
Q2 2020 a logical date?  A bit early, I would think, especially since the targets aren’t yet set. Figuring 8 years for a complete fleet turnover, you’d need to add a few years for planning…..so 2022 or 2023 makes more sense to me.  
Q3 targets beyond 2020?  Obviously I think you can….the U.S. is setting targets for 2025, and I think they’re wise to do so.

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Q4 2010 appropriate for baseline: sorry, no idea

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Q5-Q7: rate achievable by 2015 and 2020, etc.: need further analysis; presumably, 4-5 percent/yr is possible for a longer term goal, say for 2022. It may be possible to achieve this for an earlier target, because technology advances being sought (and achieved) in the EU and US should be fungible (in many cases, the same vehicle models are involved). I see no impediments for scenario 5 and 6 aside from the possibility that a target won’t be set in time for the 2015 goals.

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Q10, Q11: bonus credits for new technology, etc.?  I don’t support bonus credits, and I believe WTW accounting should be used for EVs. If you want to support EVs, provide a subsidy, but don’t mess up your fuel economy standards by awarding vehicles that achieve no CO₂ benefit with a zero CO₂ score.

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Q12-Q14: attribute based standards? I support a footprint-based standard. I believe that weight reduction will turn out to be a crucial factor in efficiency improvement, and a weight based standard will reduce the incentive for this.

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Q24: Are financial penalties the most effective way to address non-compliance?  Yes. Forbidding production may be politically impossible, too draconian.

No opinion about other questions.