



To: The Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

20<sup>th</sup> July 2026

**Consultation – New Vehicle Efficiency Standard Amendment (NVES Integration Date)  
Determination 2026**

Ford Australia welcomes the opportunity to provide input on the proposed legislative instrument adjustments to bring vehicles subject to ADR 114 into the scope of the New Vehicle Efficiency Standard (NVES). We have participated actively in consultations to date on both ADR 81/03 and ADR 114/00 and have provided our views on these to help arrive at CO2 testing mandates that achieve the shared Government and Industry objectives to ameliorate transport CO2 emissions. During this process we have highlighted that the technology to economically reduce Greenhouse gas emissions is not currently viable in all vehicle segments, and that for many commercial vehicle applications is still in the early stages of being developed.

With this in mind, Ford Australia would like to take this opportunity to highlight our concerns related to future legislation that may broaden the scope of vehicles to which mandatory CO2 testing applies and that subsequently become subject to NVES. Within the explanatory statement and fact sheets associated with the New Vehicle Efficiency Standard Amendment (NVES Integration Date) consultation, it is stated that:

“Further consultation is proposed in future years to consider what testing requirements should be adopted for cars, SUVs and utes with a GVM between 3,855 and 4,500kg to enable their inclusion in the NVES from 2030.”

Ford has outlined previously our concerns associated with extending CO2 testing mandates beyond light duty vehicles. While we feel that the upper GVM limit in ADR 114 of 3,588kg is a workable compromise to capture heavier duty vehicles within CO2 testing regulations and the NVES scheme, there are significant technical and economic impediments to extending future CO2 testing mandates to the entire NB1 vehicle category.

**Technical Challenges For Medium & Heavy Duty CO2 Testing Standards**

Fuel Economy and CO2 Test standards for Light Duty vehicles currently apply in many markets around the globe. They provide consumers fuel economy, comparative cost of ownership, CO2 emissions, and electrified powertrain range information. Examples include ECE-101, applying to vehicles under 3,500kg GVM, and ECE-154 that can be used for vehicles upto 2,840 kg Reference Mass. These standards, the test procedures used, and the ability of manufacturers to design and test to them for Light Duty vehicles are well established practices.



In the case of ECE-101, the requirements have been in place for many decades. The vehicle types affected are typically designed to operate at payloads below 1,000kg and the unladen mass of these vehicles is typically much higher than their payload capacity. These existing standards can be useful in providing consumers with relevant information for comparison, even though they mandate that tests are conducted in the unladen configuration.

Medium and Heavy Duty vehicles, by comparison, are designed for different applications and distinct operating conditions. Their powertrains are designed to do high levels of work and operate in heavily laden conditions constantly. Their engines have been designed and calibrated for these varied real-world tasks, not to the kinds of unladen driving and duty cycles that are mandated in ECE-101 style CO2 lab tests.

With this diversity of usage and subsequent work-dependant emissions, arriving at a test cycle and a single CO2 figure to correctly characterise the Greenhouse gas emissions for a given vehicle will be highly subjective. This will result in a poor basis for driving fleet wide CO2 reductions and will incorrectly penalise affected vehicles.

The vast majority of fleet CO2 standards in the world, including those in Europe and the UK, exclude Medium and Heavy duty vehicles from their regulation due to the difficulty in characterising CO2 emissions from these vehicles accurately and rewarding or penalising technologies correctly.

Consequently, by bringing vehicles beyond 3,855kg GVM into the scope of NVES, DITRDCSA will be introducing new and unrepresentative CO2 testing requirements and using these to regulate vehicles that are excluded from almost every CO2 fleet standard in the world.

### **Efficacy of Extending NVES Regulation To Vehicles Over 3,855kg GVM**

SUVs and Utes above 3,855kg GVM account for less than 1% of new vehicle sales in Australia and are negligible in terms of total fleet CO2 emissions. Those that will be captured by ADR 114, and the proposed NVES Amendment in July 2027, already represent 70% of these types of vehicles in the Australian market that are over 3,500kg GVM. Future actions that will add further regulatory complexity both in terms of additional unique ADRs and NVES fleet requirements to govern such a small group of vehicles can only result in an extremely burdensome and costly regulatory environment.

Further, it is vehicles in higher GVM ranges that are the most technically challenging to efficiently electrify. All Commercial vehicles, where payload and towing capabilities are the most important attributes, are struggling to develop effective low CO2 solutions that also deliver the levels of performance and safety that industry need. This problem is exacerbated once vehicles operate in the higher payload and towing capacities that vehicles over 3,855kg GVM deliver.

Consequently, proposals to add vehicles beyond those covered by ADR 114 into NVES will add significantly to regulatory burdens and the economic costs of doing business, while regulating high-capacity work vehicles that are least suited to utilising low CO2 technologies.



## Comments on Implementation Timing For Future CO2 Test Standards

It is known that Light Duty vehicles that are currently subject to ECE-101 and ECE-154 require substantial time and effort to undertake powertrain development activities that incorporate the performance needs of these regulations into their designs. This will become even more difficult for vehicles over 3,855kg GVM as they are currently designed to perform within the constraints of Engine Dynamometer tailpipe emissions testing and the stringent demands of customer work needs.

It is not possible to start developing vehicles that could comply with any future regulation until a heavy vehicle CO2 test standard and NVES performance targets for vehicles over 3,855kg GVM are published. To expect that this can happen by the end of 2029, given that neither the standards nor compatible test labs exist today, is technically infeasible. Only once a regulation is finalised and accepted as an ADR can the development work needed to meet it commence.

Following development, laboratory testing will be needed. These labs are typically fully booked 12 months ahead of time as the vehicles that are undergoing testing today have already been in development for 1-2 years. This testing itself can take up to three months, after which certification needs to be completed, production vehicles built and then shipped into the intended markets.

In summary, to physically test, certify, manufacture, and supply to market vehicles over 3,855kg GVM that comply with a new Fuel Economy & CO2 regulation by the end of 2029 for New and Existing Types is unachievable. Any increase in scope for CO2 testing standards needs to be appropriately scheduled in line with industry-typical lead times to prevent vehicles being locked out of the Australian market.

This means ensuring that importers have two years lead time for New Types and four years for Existing Types from the time an ADR is published until compliance is mandated.

In summary, while Ford Australia supports the shared goal of reducing transport-related Greenhouse Gas emissions, we hold significant concerns regarding future extension of CO2 testing mandates and NVES coverage to vehicles above 3,855kg GVM. This is due to three fundamental issues:

- First, there is no robust or internationally accepted CO2 test methodology for Medium and Heavy Duty vehicles, whose highly variable, work-dependent operating profiles make a single representative CO2 figure inherently unreliable.
- Second, the efficacy of such regulation is questionable with these vehicles representing a negligible share of the market and total fleet emissions, while being the least technically and economically capable of adopting low-CO2 powertrain solutions given their payload and towing demands.
- Third, the proposed 2030 timeframe is not achievable in practice, given that no test standard, performance targets, nor compliant test infrastructure currently exist, and industry-standard development, testing, and certification lead times of two to four years cannot be compressed to meet this deadline.



For these reasons, Ford Australia recommends that the Department retain the current 3,588kg GVM threshold as the upper limit for CO2 testing and NVES applicability, rather than broadening scope to the full NB1 category. We appreciate the opportunity to contribute to this process and welcome further engagement with the Department to ensure any future regulatory changes are technically sound, proportionate, and achievable within realistic industry timeframes.

Regards,

Sophia Chong  
Homologation, Strategy & Compliance Manager  
Ford International Markets Group (Australia)