



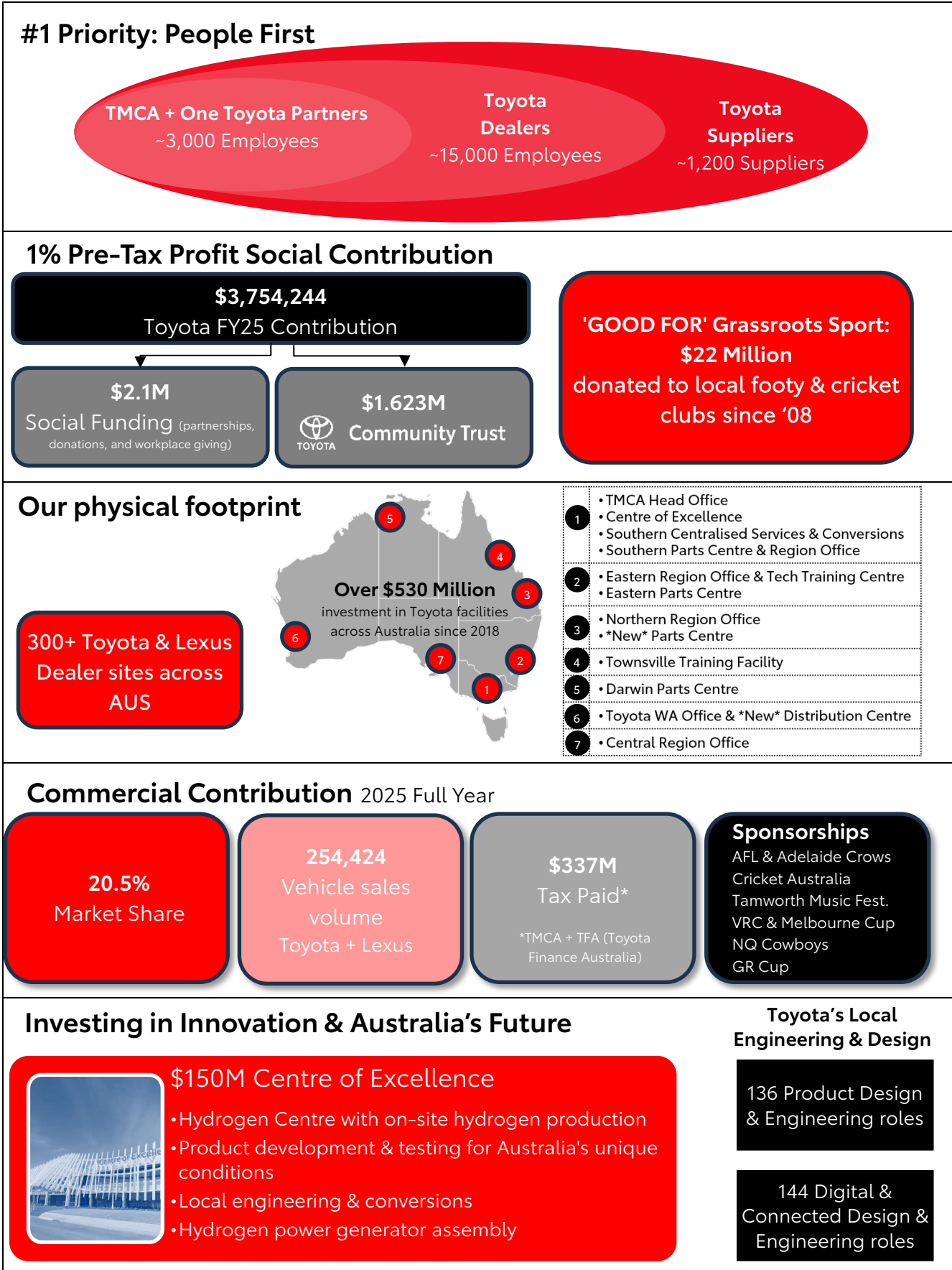
Submission by
Toyota Motor Corporation Australia
To
New Vehicle Efficiency Standard
Amendment (NVES Integration Date)
Determination Consultation

July 2026

About Toyota Australia

Toyota Motor Corporation Australia (Toyota) has been a significant part of the Australian automotive landscape since 1959.

As Australia's No. 1 automotive brand for 23 consecutive years and the most trusted name in the industry, we invest in our people, communities and technologies to ensure no Australian is left behind.



A Multi-Pathway Approach to Decarbonisation

Toyota's Decarbonisation Journey

Year	Milestone
2001	First Toyota hybrid introduced in Australia
2010	First locally produced hybrid vehicle
2015	First Mirai fuel cell electric vehicle introduced to Australia
2016	Australia's first high-pressure mobile hydrogen refueller launched by Toyota
2021	Toyota’s Hydrogen Centre opens with onsite hydrogen production
2024	Discontinuation of petrol-only variants across Toyota’s passenger vehicles (excepting GR models)
2025	Approximately 50% of Toyota and Lexus sales are electrified (BEV, PHEV, HEV)
Today	HEV, PHEV, BEV and FCEV technologies available supporting Toyota's multi-pathway approach

Multipathway Line Up

Toyota	Lexus
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Hybrid		Plug-in Hybrid	Battery Electric	Fuel Cell Electric	Heavy Duty
Yaris	LBX SUV	RAV4	bZ4X	Mirai	LC Prado
Camry	NX SUV	NX SUV	bZ4X Touring	Hilux (2028)	Hilux
Corolla Cross	UX SUV	RX SUV	Hilux		LC70
Yaris Cross	RX SUV		RZ SUV		LC300 (Perform. HEV)
Corolla	LM people mover		ES sedan		Tundra (Perform. HEV)
RAV4	ES sedan				HiAce & Coaster
C-HR	LC coupe				GX SUV
Kluger	LS sedan				LX SUV

Toyota's multi-pathway approach supports Australia's diverse vehicle requirements, operating environments and customer needs through a range of lower-emission and fit-for-purpose technologies, ensuring no one is left behind.

Executive Summary

Toyota Australia welcomes the opportunity to respond to the New Vehicle Efficiency Standard Amendment (NVES Integration Date) Determination Consultation.

Toyota continues to support an ambitious but achievable NVES which delivers meaningful CO₂ tailpipe emissions reduction and does not leave Australians behind.

Technical determinations have real-world implications. ADR 114 and the proposed NVES Amendment (NVES Integration Date) Determination updates mean the NVES will increasingly apply to the larger vehicles that keep regional Australia moving. These are vehicles that are relied on by tradies, farmers, emergency services, small businesses and regional Australians every day. As these vehicles are brought into the NVES, it is critical that implementation reflects the realities of how they are used and the availability of lower-emissions alternatives for vehicles over 3.5 tonnes¹.

Toyota has previously raised concerns regarding the application of light vehicle emissions standards to vehicle segments above 3.5 tonnes and continues to support greater international harmonisation of regulatory approaches in this area. While Toyota understands the policy intent of applying the NVES to vehicles above 3.5 tonnes and the technical pathways established through ADR 114/00 and ADR 81/03, concerns regarding implementation timing remain.

This submission outlines Toyota's key concerns regarding ADR 114/00 implementation timeframe, the proposed scope of exemptions, and the feasibility of the revised implementation timelines. In particular, Toyota highlights the importance of providing sufficient implementation time to support certification, product planning and vehicle supply for vehicle segments newly captured by the NVES framework. This issue is amplified by Australia's unique market conditions, where vehicles above 3.5 tonnes play a critical role in commercial and regional applications.

To support a more effective transition, Toyota recommends a measured approach to timing, including the introduction of a voluntary reporting period prior to mandatory compliance. This would enhance feasibility while maintaining policy integrity.

Toyota also endorses the FCAI's consultation submission and their recommendations.

¹ Year to date VFACTS, June 2026

Response

Toyota continues to support an ambitious but achievable NVEs which delivers meaningful CO₂ tailpipe emissions reduction and does not leave Australians behind.

Toyota understands the policy intent of applying the NVEs to vehicles above 3.5 tonnes and the technical pathways established through ADR 114/00 and ADR 81/03. Notwithstanding this, Toyota remains concerned that the implementation timeframe provides limited opportunity for manufacturers to undertake and finalise the testing, certification and compliance activities required for vehicle categories that have not previously been subject to these requirements in Australia, while also aligning product planning and vehicle supply arrangements with Australian market needs and the Government's policy objectives.

Toyota notes that the finalisation of ADR 114/00 in 2026 and its implementation from 30 June 2027 leaves a compressed implementation period for manufacturers to undertake certification testing, prepare compliance documentation and complete the processes required under the Road Vehicle Standards framework. While certification pathways may exist for affected vehicles, the compressed timeline limits opportunities for manufacturer to undertake these activities in an orderly manner and appropriately align product planning and vehicle supply decisions with Australian market requirements. Manufacturers require sufficient lead times to accommodate global product development cycles, certification processes, production planning and local market calibration.

While Toyota acknowledges the Government's objectives and the unique circumstances surrounding ADR 114/00, this implementation approach should not be regarded as a precedent for future ADRs or regulatory amendments. Appropriate lead times remain essential to ensure regulatory changes are implemented efficiently and without unintended consequences for customers, businesses and supply chains.

Toyota recommends introducing a voluntary reporting period for the initial six months (July 2027 through December 2027), followed by mandatory compliance from 1 January 2028. This phased approach would provide manufacturers additional time to adjust compliance planning, fleet forecasting, product allocation and inventory management processes, while maintaining policy integrity, supporting the Government's objectives and minimising disruption to vehicle availability and consumer choice.

A phased implementation approach would also provide additional opportunity to support vehicle purchasing decisions for Australian customers and businesses, particularly in regional and remote areas where vehicle capability, payload, towing

performance and operating range requirements often differ from metropolitan markets. This would help support the orderly integration of these vehicles into the Australian market as lower-emission alternatives continue to emerge across different vehicle segments.

Given ongoing global supply chain challenges and the need to align Australian requirements with global product planning cycles, additional transition time would provide manufacturers greater flexibility to align vehicle allocation, inventory management and compliance activities with the objectives of the Determination. This would support the allocation of lower-emission vehicles and emerging technologies to the Australian market, increasing the supply of ZLEVs.

Toyota also supports clarification of the proposed exemption provisions to ensure they operate as intended and do not create unintended outcomes for future vehicle certifications. In particular, Toyota supports FCAI's recommendation that the operation of section 6(1)(a) be reviewed and confirmed to avoid any inadvertent extension of exempt status beyond the policy intent.

These recommendations support an orderly and practical transition to lower-emission transport while maintaining access to the vehicles Australian consumers and businesses rely upon. They represent a pragmatic pathway that supports the Government's decarbonisation objectives while recognising Australia's unique transport environment, the importance of fit-for-purpose vehicles and the need to bring consumers along on the transition journey.

Implementing these recommendations will help industry continue on the transition journey, supporting industry feasibility and policy effectiveness while reducing the risk that these changes are implemented in a way that puts pressure on prices, consumer choice and access to fit-for-purpose vehicles throughout the transition.

Thank you for the opportunity to submit a response. We welcome the opportunity to discuss further.