

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 8 October 2024 11:32 AM
To: CleanerCars
Subject: Submission on the New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024 Consultation Draft

Dear Cleaner Cars team,

I am a vehicle certification agent representing a number of OEMs in the light vehicle space, responsible primarily for obtaining VTA and regulatory updates.

I would like to provide my views on the New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024 Consultation Draft

Adequate Leadtime NB1 Category Vehicles

We have concerns regarding the insufficient lead time provided under ADR 81/02 Compilation 8 for NB1 category vehicles.

Manufacturers already supplying NB1 vehicles to the market need sufficient time to manage critical steps, such as procuring vehicles for testing, scheduling tests, obtaining test reports and approvals, and then finally obtaining the Vehicle Type Approvals (VTAs).

Without adequate lead time, these processes could face disruptions, leading to delays in compliance and market readiness. To ensure a smooth transition and compliance with the new requirements, we support the timelines included in the FCAI's response and support their call for a minimum of 24 months lead time following the publication of an ADR.

This would allow manufacturers to prepare for the introduction of new models. Furthermore, I support their recommendation of an additional 24 months to address the development, testing, validation, and compliance for all existing models already on the market, to avoid disruption and ensure regulatory compliance.

Emergency Service Vehicles

We support the concerns raised by the FCAI about the current consultation exemptions for the NVES, as several important vehicle categories have been left out, despite being addressed in the original impact analysis.

- The original analysis indicated that vehicles such as military, law enforcement, emergency services, agricultural and construction equipment, motorhomes, large trucks, motorcycles, and others would be exempt from the NVES.
- These exemptions are missing from the current consultation document, which is concerning given the public service roles of these vehicles.
- Vehicles used for military, law enforcement, and emergency services are typically sourced under strict performance requirements and should not face penalties or compliance issues, given their critical importance.
- We believe these vehicles should be exempt from NVES requirements, and a practical solution can be developed between industry and the Department to implement this.

Other Items

In providing feedback on other key issues within the NVES, we are concerned that the MIRO for cab-chassis vehicles has not been addressed. Currently, cab-chassis vehicles are supplied to the RAV as incomplete vehicles without a declared Tare Mass, and similarly, the MIRO cannot be finalised as it depends on the rear tray or other modifications fitted.

Since cab-chassis models typically have an equivalent 'complete' pick-up variant, we suggest the simplest but most logical and fairest solution would be to apply the MIRO of the equivalent pick-up body to address this issue effectively. For those which do not have an equivalent pick up (often in the case of a single cab-chassis), we would suggest a nominated value of the heaviest genuine tray offered by the manufacturer.

This may be subject to audit by the Department, if required. The manufacturer should maintain a self-certification compliance folder, which includes the declared value of the incomplete vehicle and the mass of the tray. This information could be verified by a weighbridge certificate of the complete vehicle as necessary.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]