

Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:

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1 Confirm that you have read and understand this privacy notice.

Yes

2 Please indicate how and if you want your submission published.

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Andrew Burbridge

4 Confirm that you have read and understand this declaration.

Yes

5 First name

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9 Who are you answering on behalf of?

Individual or individuals

10 Organisation name

Not answered

11 What best describes you or your organisation?

Not answered

12 What sector do you represent?

Not answered

13 What state or territory do you live in?

Queensland

14 Postcode

4516

15 What area best describes where you live?

Regional area

16 1. Do you support the proposed guiding principles?

No

17 1.1 Please add details to your response.

Generally yes, but the emphasis in guiding principles (2) and (3) suggest that emission reduction strategies that have an economic benefit-cost ratio less than unity would not be pursued, despite having positive effect on emissions. Making an economic paradigm a constraint is problematic.

18

2. Do you support the use of the avoid-shift-improve framework as a tool to identify opportunities for abatement?

Yes

19 2.1 Please add details to your response.

My answer is positive albeit conditional.

Firstly, the 'avoid' component is defined as removing travel which people would PREFER not to make: the definition seems weak. A stronger message would be to remove (or at least reduce substantially) travel that people or goods do not NEED to undertake. While the costs of all travel are externalised to the broader community and to future generations as is presently the case, movement of goods and people is far less costly than it should be, and as such discretionary travel appears economically viable.

20 3. Do you agree the development of a national policy framework for active and public transport will support emissions reduction?

No

21 3.1 Please add details to your response.

Potentially: it depends on the content of the national policy framework, and the legislative strength that supports its implementation.

As an aside, in the preceding sections, the framework being promoted was labelled 'avoid-shift-improve'. This section of the document (2.1) starts with a section on improving efficiency, which [according to Jevon's Paradox] could yet increase travel, not avoid it.

22 4. What should be included in a national policy framework for active and public transport and how should it be developed?

A national policy framework for active and public transport must include meaningful commitment to meaningful funding, based on UN recommendations, cascading down through federal, state and local government to those modes, not in addition to current road funding but in lieu of it. Taken at face value, Queensland's QTRIP (2024-2028) for example currently stands at 0.8% funding commitment to 'Active Transport' compared to 59.7% commitment to 'Roads'.

23 5. What additional actions by governments, communities, industry and

other stakeholders need to be taken now and in the future to ensure the movement of people contributes to transport emissions reduction?

Aside from mandating a more equitable funding share (as noted at the previous point), the commonwealth government must overhaul the way it subsidises the road transport system whether directly through promotion of procurement of 'road-biggering' projects or indirectly through subsidies given to certain vehicles: for example, economics 101 would surely demand that governments tax what they want less of and subsidise what they want more of. So, by first allowing, and then by extension of a favourable tax system promoting sales of vehicles that are grossly over-sized for the tasks they need to perform, government is presently funding emissions at the expense of those who are working to reduce them.

24 6.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure that the movement of goods contributes to transport emissions reduction?

All of the document assumes growth in freight movement. There is no discussion about either reducing demand and so the need to move freight or reducing the way freight is moved.

As with earlier responses, the roadmap seems 'light' on the 'avoid' component of the 'avoid-shift-improve' framework.

25 6.2. How would these actions address the identified challenges and opportunities for emissions reduction in the movement of goods?
Not answered.

26 7. Do you agree with the proposed net zero pathway for light road vehicles?

No

27 7.1 Please add details to your response.

There's no question that electrification of the vehicle fleet will reduce per kilometre emissions. However in terms of 'avoid' the document is silent. See also answers to questions 2.1, 3.1, 4 & 5.

28 8. The Australian Government is currently developing an Australian New Vehicle Efficiency Standard and has already begun to implement actions in the National Electric Vehicle Strategy.8.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce light vehicle emissions?

Already covered at questions 2.1, 3.1, 4 & 5.

29 8.2 How would these actions address the identified challenges and opportunities to reduce light vehicle emissions?

Not answered.

30 9. Do you agree with the proposed net zero pathway for heavy road vehicles?

No

31 9.1 Please add details to your response

Not answered.

32 10. The proposed pathway for heavy road vehicles relies on a mix of battery electric, hydrogen fuel-cell and low carbon liquid fuels. Rank from 1 to 3, the order in which these should be prioritised for emissions reduction.

Not answered

33 10.1 Please add details to your response. Why did you rank them in that order?

Not answered.

34 11. What role should low carbon liquid fuels play in the heavy vehicle decarbonisation?

Not answered.

35 12. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce heavy vehicle emissions?

Not answered.

36 13. Do you agree with the proposed net zero pathway for rail?

Not answered

37 13.1 Please add details to your response.

Not answered.

38 14. The proposed pathway for rail relies on a mix of battery electric, hydrogen fuel-cell and low carbon liquid fuels. Rank from 1 to 3, the order in which these should be prioritised for emissions reduction.

Not answered

39 14.1 Please add details to your response. Why did you rank them in that order?

Not answered.

40 15. What role should low carbon liquid fuels play in rail decarbonisation?

Not answered.

41 16. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce rail emissions?

Not answered.

42 16.1 How would these actions address the identified challenges and opportunities to reduce rail emissions?

Not answered.

43 17. Do you agree with the proposed net zero pathway for maritime?

Not answered

44 17.1 Please add details to your response.

Not answered.

45 18. The Australian Government is engaging in consultation as part of the development of the Maritime Emissions Reduction National Action Plan and those consultations will also inform the final Roadmap and Action Plan.

18.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce maritime emissions?

Not answered.

46 18.2 How would these actions address the identified challenges and opportunities to reduce maritime emissions?

Not answered.

47 19. Do you agree with the proposed net zero pathway for aviation?

Not answered.

48 19.1 Please add details to your response.

Not answered.

49 20. The Australian Government has already engaged in consultation on aviation decarbonisation through the development of the Aviation White Paper and those consultations will also inform final Roadmap and Action Plan.

Not answered.

50 20.1 What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce aviation emissions?

Not answered.

51 21. Do you agree with the proposed net zero pathway for transport infrastructure?

No

52 21.1 Please add details to your response.

The notion stated in section 4.1 at the top of page 69 that new roads or upgraded roads may ease traffic congestion is flawed logic. Road improvements create traffic by releasing latent demand or attracting mode shift towards the most inefficient transport mode.

It is disappointing that a document that is intended as a roadmap to emissions reductions gives airtime to construction of more roads.

53 22. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce transport infrastructure emissions and ensure that transport infrastructure is ready for and enables low-emission transport modes?

A moratorium on road "biggering" should be a minimum.

54 22.1 How would these actions address the identified challenges and opportunities to reduce transport infrastructure emissions?

Not answered.

55 23. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to ensure the energy mix is ready to support transport emissions reduction?

Not answered.

56 24. How should the use of low carbon liquid fuels (LCLFs) be prioritised across different transport modes over time to achieve maximum abatement?

Not answered.

57 25. What are the best ways for the Australian Government to work collaboratively with industry, business, governments and communities to implement the proposed pathways?

Not answered.

58 25.1 What are good domestic or international examples of partnership and collaboration on transport and transport infrastructure emissions reduction that could inform the final Roadmap and Action Plan?

Not answered.

59 25.2 What opportunities can Government leverage to show leadership in Australia and internationally?

Not answered.

60 26. What measures and metrics should be used to evaluate the final Transport and Infrastructure Net Zero Roadmap and Action Plan?

Not answered.

61 26.1 What other data and evidence could governments use and how could this offer further insights on the pace, scale and location of transport emissions reduction pathways?

Not answered.

62 27. Do you have any feedback on the proposed review process?

Not answered.

63 28. Do you have any further feedback on the Consultation Roadmap and proposed pathways?

Not answered.

64 28.1 Is there anything missing? Are the sections appropriately

integrated? Is the Roadmap appropriately ambitious?

The Roadmap is insufficiently ambitious, but rather disappointingly unambitious.

65 29. Is there any further information or documentation that you wish to be considered with your submission?

Nil.

66 Would you like to upload a document?

No

67 Have you removed any identifying information from your submission?

Not answered

68 Upload a submission

Not answered

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered