

# Transport and Infrastructure Net Zero Consultation Roadmap

## Take the survey

Department of Climate Change, Energy, Environment and Water

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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.

Public

3 Published name

Australian Electric Vehicle Specialists

4 Confirm that you have read and understand this declaration.

Yes

5 First name

Edwin

6 Last name

Higginson

7 Email

[REDACTED]

8 Phone



9 Who are you answering on behalf of?

Organisation

10 Organisation name

Australian Electric Vehicle Specialists

11 What best describes you or your organisation?

Industry

12 What sector do you represent?

Light road vehicles (cars, utes etc.)

Heavy road vehicles (trucks, buses etc.)

13 What state or territory do you live in?

New South Wales

14 Postcode

2322 - Newcastle City Council

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.

You have failed to acknowledge how to deal with 21 million road registered vehicles that currently use Petrol and Diesel. for all of those vehicles purchased up until 2035, they will have a useful life of 20 to 40 years and so converting them from fossil fuels to electric needs to be included within the strategy, especially if you are considering the impact on the circular economy.

- 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.  
Shifting to zero emissions should not just focus on purchasing a new EV from overseas, but also by using the existing vehicle and shifting from an internal combustion engine to an electric drivetrain, which can be an easy solution and provide manufacturing and automotive jobs here in Australia.
- 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.  
There are plenty of opportunities to use public transport today, but people choose to have their own vehicle for a number of reasons. Even in countries that have an exceptional public transport system like Norway, Holland, London, New York and others, they all still have a high number of car owners.
- 22** 4. What should be included in a national policy framework for active and public transport and how should it be developed?  
Needs to include the Circular Economy. Purchasing brand new electric buses is not the best way. Why not extend the life of existing vehicles by swapping out their engines for electric. Safety features can be added in too for upgrades too
- 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?  
An improved national communication network. I use the NBN at home and struggle to get consistent service so for important meetings I need to go into my work
- 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?

There are no electric vehicle charging stations designated for trucks in Australia.

We have been solely focused on car ev charging stations, but an electric truck cannot access them. Also, our national truck width laws recently got increased from 2.50m to 2.55m in order to allow for Electric trucks to be imported, but there are also a large number of electric trucks available at 2.60m. We also have the lightest front axle weights in the world, which again limits the importation of commercial EVs.

25 6.2. How would these actions address the identified challenges and opportunities for emissions reduction in the movement of goods?

By aligning our truck width and weight limits with the rest of the world, it would allow for a much quicker adoption of zero emission transport.

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.

It does not address what will happen to the 21 million road registered vehicles currently using an internal combustion engine. Does the Government intend to scrap these and push everyone to purchase new EVs from overseas, or will they consider allowing zero emission incentives to be used for converting these to electric in order to extend their life, assist people who want to switch but cannot afford a new vehicle, whilst also assisting the Australian Manufacturing industry. The French Government did this which has resulted in some amazing conversion solutions in Europe.

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?

Include electric vehicle conversions as part of the solution, which will ultimately assist Australia reach zero emissions sooner.

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

Light vehicles in Australia have a useful life of 15 to 30 years, so converting them to electric will only assist to reduce transport emissions

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

Australia needs to increase our widths to 2.60 and increase our front axle weights to be in line with Europe to allow for the importation of all zero emission heavy vehicles, many of which are not currently available here today. We need to have a heavy vehicle electric charging station network strategy, as we do for cars. And we need to include electric conversions as heavy vehicles have a much longer useful life of 20 to 40 years.

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.

1: Battery electric

2: Low carbon liquid fuels

3: Hydrogen fuel cell

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

Electric Vehicles are the most efficient at around 80% from energy consumption to drive at the wheel and provides the lowest level of emissions overall, even when using Coal powered electricity.

Hydrogen is around 45% efficient so is only a short-term solution until battery technology improves to the point of being able to travel 1,000 to 1,500 km on a single charge.

Low Carbon fuel is great for marketing, like no sugar drinks, but they still produce carbon when burnt and nasty particles from the exhaust.

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

decarbonisation?

They are better than carbon liquid fuels, but should not be the long-term solution.

- 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?

Australia needs to increase our widths to 2.60 and increase our front axle weights to be in line with Europe to allow for the importation of all zero emission heavy vehicles, many of which are not currently available here today. We need to have a heavy vehicle electric charging station network strategy, as we do for cars. And we need to include electric conversions as heavy vehicles have a much longer useful life of 20 to 40 years.

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

- 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.  
1: Battery electric  
2: Low carbon liquid fuels  
3: Hydrogen fuel cell

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

- 40 15. What role should low carbon liquid fuels play in rail decarbonisation?  
Short term solution only. They still burn and emit emissions

- 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?

Be serious in investing in the technology today.

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

Stop talking and start acting

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

Yes

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.

Need to include various solutions and assist Australian innovation and manufacturing to get there

- 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?

Not answered

- 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?

As outlined previously, you need to address what will happen with the existing 21 million

vehicles currently on the roads, and how conversions needs to be part of the solution.

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

LCLFs should only be a short-term solution to replace carbon fuels, but LCLFs still produce carbon!

- 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?

Invest in Australian Industry and Manufacturing. Reduce red tape, introduce incentives that assist with local Manufacturing rather than simply asking people to buy new EVs from China

- 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?

France have invested in electric vehicle conversions

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

Get serious about transitioning all vehicles to zero emissions now

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

Need to tax on emissions produced per kilometre travelled and measure it to truly incentivise consumers to shift from carbon producing fuels, to zero emissions.

- 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?

Look to Governments like Norway to understand why their population has embraced the take up of electric vehicles, both light and heavy.

- 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?  
Converting vehicles to electric needs to be included and considered
- 65 29. Is there any further information or documentation that you wish to be considered with your submission?  
Not answered
- 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