

# Transport and Infrastructure Net Zero Consultation Roadmap

## Take the survey

Department of Climate Change, Energy, Environment and Water

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Response received at:

July 26, 2024 at 10:44 AM GMT+10

Response ID:

sbm2f82969fd4603ab438dc5

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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

Cancer Council Australia

4 Confirm that you have read and understand this declaration.

Yes

5 First name

Matthew

6 Last name

Govorko

7 Email

[REDACTED]

8 Phone



9 Who are you answering on behalf of?

Organisation

10 Organisation name

Cancer Council Australia

11 What best describes you or your organisation?

Not for profit

12 What sector do you represent?

Other: "Public health"

13 What state or territory do you live in?

Western Australia

14 Postcode

6008

15 What area best describes where you live?

City

16 1. Do you support the proposed guiding principles?

Not answered

17 1.1 Please add details to your response.

Not answered

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

Not answered

- 19** 2.1 Please add details to your response.  
Not answered
- 20** 3. Do you agree the development of a national policy framework for active and public transport will support emissions reduction?  
Not answered
- 21** 3.1 Please add details to your response.  
Not answered
- 22** 4. What should be included in a national policy framework for active and public transport and how should it be developed?  
Not answered
- 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?  
Not answered
- 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?  
Not answered
- 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?  
Not answered

- 27 7.1 Please add details to your response.  
Not answered
- 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?  
Not answered
- 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?  
Not answered
- 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?  
Not answered
- 52 21.1 Please add details to your response.  
Not answered
- 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?  
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?  
Not answered

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?

Yes

67 Have you removed any identifying information from your submission?

Yes

68 Upload a submission

Transport and Infrastructure Net Zero Consultation Roadmap FINAL CCA.pdf

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered

## Department of Infrastructure, Transport, Regional Development, Communications and the Arts

### Transport and Infrastructure Net Zero Consultation Roadmap

#### Submission from Cancer Council Australia

Cancer Council's Occupational and Environmental Cancer Committee (the Committee) includes members with national standing in relevant disciplines including epidemiology, molecular biology, occupational health, occupational hygiene, clinical oncology, and public health. Comments from the Committee form the basis of this submission and their important contribution is acknowledged.

Submission endorsed by:

Megan Varlow, Acting Chief Executive Officer, Cancer Council Australia

Submission contact:

Dr Matthew Govorko



#### GENERAL COMMENTS

Cancer Council Australia welcomes the opportunity to provide feedback on the Transport and Infrastructure Net Zero Consultation Roadmap – July 2024.

Cancer Council advocates to change laws and policies to reduce cancer risk. As Australia's largest independent, non-government cancer control organisation, we seek to have our evidence-based policy recommendations translated into practice through our representations to government. As such, Cancer Council strongly believes that Australians' health should be the government's number one priority when considering any decisions that impact the community, especially when these decisions concern exposure to carcinogens and increasing cancer risk.

Cancer Council are concerned because outdoor air pollution and particulate matter in outdoor air pollution are classified by the International Agency for Research on Cancer (IARC) as *carcinogenic to humans* (Group 1). Both outdoor air pollution and particulate matter in outdoor air pollution cause lung cancer. There is also a positive association between outdoor air pollution and cancer of the urinary bladder.<sup>1</sup>

Physical activity levels and rates of overweight and obesity of individuals and communities can be significantly affected by various components of the physical environment.<sup>2,3,4</sup> Engaging in regular physical activity offers profound benefits to both physical and mental well-being. It plays a crucial role in preventing various health conditions, including up to 13 different types of cancer<sup>5</sup> and chronic diseases such as heart disease.<sup>6</sup> In 2020-21, approximately three-quarters of the Australian population did not meet the recommended physical activity guidelines.<sup>7</sup> Approximately 5% per cent of the cancer burden in Australia is attributed to physical inactivity.<sup>8</sup>

Studies have demonstrated that factors such as where people live, their socioeconomic status, and the presence of appropriate spaces for physical activity can collectively affect the extent to which they

participate in physical activities. A well-designed physical environment has the propensity to reduce physical inactivity levels and promote public health, including reducing cancer risk.<sup>9</sup>

Cancer Council strongly supports action by the Australian Government to implement a national policy framework. In particular, one that supports the adoption of active and public transport for the purpose of enhancing good health and wellbeing among the population as well as assisting in emissions reduction.

## CONSULTATION QUESTIONS

Cancer Council have taken the approach of answering select questions below from the consultation that directly relate to our areas of concern, and that we can best speak to based on our expertise and available evidence.

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

Active transport has been shown to support a reduction in pollution and CO<sub>2</sub> emissions, subsequently assisting with efforts to combat climate change.<sup>10</sup> The development of infrastructure and policies that transform the physical environment and facilitate active transportation is crucial for achieving sustainability goals and promoting active transport. Implementation of Sustainable Urban Mobility Plans have proven effective in not only increasing physical activity but also preventing cancer, obesity, and chronic diseases.<sup>11, 12</sup>

Consistent evidence suggests that built environment attributes, such as urban planning elements, street-level features, and dedicated walking, cycling paths and safe road crossing infrastructure throughout the community connecting schools, workplaces, shopping areas and recreational spaces, play a significant role in encouraging active transportation among adults and children.<sup>13,14,15,16</sup>

Furthermore, numerous studies strongly support the idea that active transportation such as walking or cycling to school or other destinations has positive effects on the health of children.<sup>12,17</sup> Prioritising active transportation infrastructure and policies is a fundamental step towards healthier, more sustainable, and more liveable communities for all.

Evidence suggests that 'walkable' environments are associated with decreased rates of obesity and higher levels of physical activity which have been established as protective factors for cancer.<sup>15,16</sup> Key characteristics of a walkable environment include mixed land use, higher residential density, street connectivity and design, availability of footpaths, attractive surrounds, and perceptions that the environment is safe.<sup>2,13, 18,19</sup> Positive associations have been shown between walkability, street connectivity and residential density/urbanisation, and total walking for transport in adults aged 65 years and older.<sup>20</sup>

#### **Q4. What should be included in a national policy framework for active and public transport and how should it be developed?**

Evidence suggests that the implementation of Sustainable Urban Mobility Plans that include three main policy areas including convenient transport infrastructure development, TMEPA (transport modes enhancing physical activity) promotion, and shift of transport mode have been shown to reduce sedentary behaviours and promote higher physical activity levels.<sup>11,12</sup> Such an approach offers direct health benefits including increased physical activity, reduced respiratory, mental, and physical health problems as well as indirect health benefits such as curbing obesity and chronic diseases and contributing to mitigating the environmental and health impacts of climate change. The findings of a comprehensive systematic review and meta-analysis involving 21 studies reveal that TMEPA related interventions have proven effective in reducing car dependency, potentially leading to increased daily physical activity for individuals.<sup>12</sup> However, barriers such as complex institutional structures and dominant motorised traffic can hinder implementation.<sup>12, 17</sup>

The available evidence regarding the health benefits of active transportation for children is highly persuasive. A study conducted in the United Kingdom demonstrated that children who walked or cycled to school significantly exhibited better fitness levels compared to those who relied on other transportation means such as a bus or car. Moreover, this increase in fitness was particularly notable among girls.<sup>17</sup> In contrast, a study conducted in Western Australia revealed that children driven to school displayed lower levels of physical activity during weekdays and participated in fewer active leisure activities, especially girls. These findings serve as an encouraging reminder of the significance of promoting active modes of transportation for children, especially girls, to safeguard their health and overall well-being.<sup>17</sup> Despite these clear advantages, it is disconcerting to observe a decline in children's utilisation of active transportation methods over the past three decades in developed countries, including Australia, where a significant proportion of students no longer use active means to travel to school.<sup>21</sup> Factors such as low traffic and high street connectivity in neighbourhoods play a pivotal role in determining whether children can walk to school.<sup>17</sup> The acknowledgement of the potential health advantages linked to active transport emphasises the rising significance of interventions in transportation and urban design. These interventions as well as educational programmes acts as vital mechanisms to encourage active modes of travel and improve the overall health of populations.<sup>12, 17</sup>

**Q5. 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?**

The National Obesity Strategy considers connected spaces such as cycle paths and walkways as paramount in supporting Australians to be active within their communities.<sup>22</sup> Cancer Council urges all Australian governments to act on these recommendations, including linking national strategies and priorities together, to reduce barriers to physical activity and develop strategies for safer and more accessible environments which promote active transport as a mechanism for better health and in supporting a reduction in transport emissions.

**Q12. What additional actions by governments, communities, industry and other stakeholders need to be taken now and in the future to reduce heavy vehicle emissions?**

As noted in the Consultation Roadmap, the transport sector is the third-largest source of greenhouse gas emissions in Australia, accounting for 21% of Australia's greenhouse gas emissions in 2023. Concerningly, transport will be the largest source of emissions in Australia by 2030 without further action. Road transport is the main source of transport emissions at around 83%; light vehicles are responsible for almost 60% and heavy vehicles account for 23% of the transport sector's emissions. This means that light and heavy vehicles present the largest abatement opportunity for the transport sector. In addition to releasing greenhouse gas emissions due to the combustion of fossil fuels, vehicles with internal combustion engines emit other noxious substances which contribute to harmful air pollution, including particulate matter and diesel engine exhaust (DEE).

In 2018, 1.3% of the total disease burden in Australia was due to air pollution. Moreover, air pollution was found to be responsible for 3.4% of the lung cancer burden, with 306 lung cancer deaths and 5314 years of life lost in Australia.<sup>23</sup> Although not all air pollution is attributable to transport, it is a major source, and certainly contributes to this disease and cancer burden in Australia.

A further aspect of air pollution that Cancer Council are concerned about is DEE emissions. The most recent evaluation published by IARC in 2014 determined that DEE is *carcinogenic to humans* (Group 1) and causes lung cancer. Positive associations have also been observed between DEE and bladder cancer.<sup>24</sup>

DEE is listed as one of the 38 priority carcinogens relevant to working conditions in Australia.<sup>25</sup> It is the second most common carcinogen workers are exposed to in Australia, with an estimated 1.2 million workers exposed to DEE in 2011.<sup>26</sup> The study by Carey and co-workers<sup>27</sup> estimated that in 2011 about 29% of male workers and 6% of female workers in Australia were occupationally exposed to DEE. More specifically, road transport workers, particularly heavy vehicle drivers, experience a high prevalence of exposure to DEE at work. It was estimated that 96.7% of road transport workers in Australia were probably exposed to DEE in 2011.<sup>28</sup> Another study estimated that among the cohort of workers occupationally exposed to DEE in 2012, over the lifetime of the cohort, 4450 will develop lung cancer and 600 will develop bladder cancer thought to be attributable to DEE.<sup>29</sup> Each year, approximately 130

Australians are diagnosed with lung cancer caused by work-related exposure to DEE.<sup>30</sup> Therefore, DEE exposure, and resultant cancer, is significant in the Australian workplace and needs appropriate control.

There is no known safe threshold level of exposure to fine particulate matter (PM<sub>2.5</sub>) and DEE below which health impacts do not occur. This means that the lower the level of exposure to these carcinogens, the lower the risk of related cancers and the more beneficial it is for the public's health. From a cancer-control perspective, we support policies focused on the control and minimisation of air pollution, including the reduction of particulate matter in outdoor air pollution and DEE, to the greatest possible extent.

As a large source of emissions, it is important to implement new policies and improved technology to reduce the amount of air pollution caused by road transport. We support the design and development of transport systems and networks that encourage a shift to sustainable, low emissions ways of moving people and goods. This includes implementing international best-practice emissions reduction measures, emission standards, and fuel quality standards; it is unacceptable that Australian standards have consistently trailed behind other advanced economies like the European Union.<sup>31</sup>

As addressed in section 3.1 *Road – light vehicles*, we acknowledge that Australia is a car-dependent society and that light vehicles present the largest emissions saving potential in the transport sector, which can be decarbonized with electrification. We note that electric vehicles (EVs) have zero tailpipe emissions, and that offset of emissions from production is achieved within one (renewably sourced electricity) to two (charged from the grid) years. Additionally, secondary emissions from charging an EV are already lower than internal combustion engines and will continue to decrease as the electricity system decarbonizes. This will result in better air quality (i.e., less air pollution) and better health outcomes for the population (i.e., less negative health impacts, including air pollution-related lung cancers).

Therefore, we support encouraging the supply of more low and zero-emissions vehicles to the Australian market. More specifically, we support in principle the National Electric Vehicle Strategy and the introduction of an Australian New Vehicle Efficiency Standard, which will help increase the availability and affordability of fuel-efficient vehicles and reduce the supply of high emitting vehicles.

Cancer Council believes that exposure to DEE should be eliminated where possible or reduced to as low as reasonably practicable to protect workers and people in the broader community and minimise their risk of developing DEE-related lung disease. We consider government regulation and implementing best-practice emission standards for on-road and non-road diesel engines as the most appropriate approaches and are essential.

As outlined in section 3.2 *Road – heavy vehicles*, we acknowledge the unique challenges that heavy vehicles face in achieving net zero. However, we are concerned that “old” trucks make up a large share of the fleet, which means “older, higher emission vehicles are staying on our roads longer” (p.42). Notably, it is projected “that emissions from articulated and rigid trucks will increase by 15% in the next decade” (p.42) without intervention. Together with improving efficiency standards, it is essential to remove and replace existing diesel engines, especially older diesel engines. This will result in less fuel

being consumed and reduced DEE emissions from heavy vehicles.

Government plays a crucial role in encouraging the supply of low and zero-emission technologies and fuels and enabling infrastructure and incentives to shift demand away from diesel vehicles. Therefore, Cancer Council calls on the Australian Government to support the necessary regulatory changes (such as width and mass limits) that remove barriers to implementing Euro VI heavy vehicles and the uptake of battery electric and hydrogen trucks (i.e., zero emission trucks available overseas) in Australia to reduce noxious emissions from heavy vehicles, including particulate matter. Furthermore, we urge the government to pursue initiatives (such as trials, subsidies, loans or other incentives) that encourage business and single vehicle owners to adopt zero-emission trucks.

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