

Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:

July 26, 2024 at 10:30 AM GMT+10

Response ID:

sbm2f828aaab41149ee4300e

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

Justice and Equity Centre

4 Confirm that you have read and understand this declaration.

Yes

5 First name

Sheetal

6 Last name

Balakrishnan

7 Email

[REDACTED]

8 Phone



9 Who are you answering on behalf of?

Organisation

10 Organisation name

Justice and Equity Centre

11 What best describes you or your organisation?

Not for profit

12 What sector do you represent?

Other: "Community legal sector"

13 What state or territory do you live in?

New South Wales

14 Postcode

Not answered

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

24.07.26 Submission to Transport and Infrastructure Net Zero Consultation Roadmap (1).pdf

69 Upload a submission

Not answered

70 Upload supporting file

Not answered

71 Upload supporting file

Not answered

26 July 2024

Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
CANBERRA ACT 2601

Dear Secretary

Transport and Infrastructure Net Zero Consultation Roadmap

The Justice and Equity Centre ('JEC'), formerly the Public Interest Advocacy Centre ('PIAC'), welcomes the opportunity to make this short submission in response to the Transport and Infrastructure Net Zero Consultation Roadmap ('Consultation Roadmap').

The JEC is a leading social justice law and policy centre. We work with people and communities who are marginalised and facing disadvantage – including people with disability. We have a long history of involvement in public policy development and advocacy promoting the rights and equal participation of people with disability, working in consultation with disability advocates and disability representative organisations. Accessible public transport is a current priority of our work, and we have considerable experience in disability discrimination litigation and public policy development.

The JEC is also committed to ensuring a just transition to a zero-carbon energy system for Australia. The impacts of climate change fall most heavily on people and communities experiencing disadvantage, who are often least equipped to adapt to its effects. We need urgent action if we are to mitigate the worst impacts of climate change and achieve Australia's goal of a net-zero economy by 2050. We must move from a reliance on fossil fuels to sustainable, clean energy sources to rapidly reduce greenhouse gas emissions.

Transport and transport infrastructure plays a vital role in meeting those goals. But a just transition must be underpinned by social and economic transformation that puts people and communities first, achieving equity for those who are disadvantaged as we seek a more sustainable future.

The Roadmap must incorporate *Australia's Disability Strategy 2021-2031* to ensure transport is accessible

We are pleased the Consultation Roadmap recognises a main barrier to active and public transport adoption is accessibility, and proposes 'inclusive and equitable' as one of the five guiding principles.

As the Department will be aware, *Australia's Disability Strategy 2021-2031* prioritises the need for accessible transport systems, which includes adopting universal design principles.

Transport that is not accessible will continue to exclude people with disability from participating in work, education, social and cultural life, infringing on their rights. Crucially, it will counteract the success of the transition to net zero.

We urge the Department to ensure the 'inclusive and equitable' guiding principle for the Roadmap incorporates the priorities of *Australia's Disability Strategy 2021-2031*. Pathways for transport and infrastructure to contribute to net zero must include regulation and investment to achieve a transition that is accessible and fair.

People with disability face systemic issues using public transport and infrastructure

Systemic discrimination in public transport and infrastructure presents significant barriers for people with disability accessing and participating in the community.

This is evidenced by the need for the *Disability Standards for Accessible Public Transport 2002* (Cth) ('Transport Standards'), which sets requirements for public transport operators and providers to make their services accessible. However, with most target dates for compliance not achieved, the Transport Standards have not been effective in removing discrimination. This precludes many people with disability from accessing public transport and infrastructure, with increased dependence on private vehicles contributing to transport emissions.

It is vital the Australian Government uses the opportunity to decarbonise public transport and infrastructure to prioritise accessibility, including through regulation and investment to modernise the public transport system.

To illustrate, our work has highlighted how issues with new modes of active transport can disproportionately impact people with disability.

Across Australia there have been reports of accidents involving e-scooters and injuries to pedestrians (particularly on footpaths). While these issues are relevant to all members of the public as pedestrians, through our work we are aware this issue is of particular concern for people with disability – for example, e-scooter riders hitting people who are blind or vision impaired, or e-scooters blocking access for a wheelchair user on a footpath or kerb ramp.

These issues have led to a reported lack of confidence among people with disability accessing public spaces. Investment in technology and government regulation can and has been used to govern the use of such active transport (eg geo technology to limit speed limits, stop users riding on footpaths, prevent obstruction of footpaths).

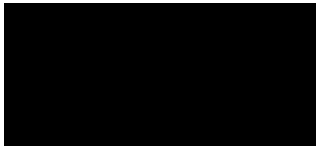
Government needs to ensure the introduction of new modes of active and public transport prioritise accessibility for all as a guiding principle, and infrastructure for the use of those new modes does not reduce accessibility of shared spaces or existing infrastructure designed to meet the needs of people with disability. Every effort should be made to achieve the emissions reduction and other benefits that come from active and public transport in a way that also prioritises (and does not compromise) accessibility.

It will be crucial to realising this vision of inclusive and equitable transport to involve people with disability in the development and design of policies and initiatives which seek to implement the Roadmap, from the outset.

The Roadmap should recognise the importance of co-design with people with disability in the planning, design and delivery of policies and infrastructure which will affect their ability to participate in the community. This can ensure accessibility is a central feature of transport and transport infrastructure and not just an afterthought.

Please do not hesitate to contact me if you would like to discuss any of the matters raised in this letter.

Yours sincerely



Ellen Tilbury
Principal Solicitor