

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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Tim Kelly
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Yes
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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?

South Australia

14 Postcode

5233

15 What area best describes where you live?

Regional area

16 1. Do you support the proposed guiding principles?

Yes

17 1.1 Please add details to your response.

The Principles cannot be applied without clarity on emissions reduction rules and ensuring a sound policy foundation so that evidence based decisions can apply.

As it stands, this Strategy is based on location based thinking for decarbonising the electricity grid. For example: "The primary method for reducing transport emissions will be through electrification, which is dependent on the decarbonisation of the electricity grid". Such a statement is oblivious to the transition to market based accounting where

the transition will be fully dependent on ensuring that consumers can purchase accredited renewable electricity at a fair price, with integrity and without the double counting caused by Departments persisting with location based statements and claims. The rules for emissions reduction need to be set in legislation to stop the current situation where all accredited renewable electricity is double counted and the market exists in constant confusion with greenwashing, free riding, and unfair pricing structures rife.

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

No

19 2.1 Please add details to your response.

More is required. Avoid - Shift - Improve - Prevent Greenwashing - Be accountable

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

Yes

21 3.1 Please add details to your response.

It must help but radical transformation is required. Massive funding is poured into road and highway infrastructure upgrades that devastate environments and drive massive road kill and population stranding. As much effort must be put into active transport infrastructure as is put into creating faster and bigger road infrastructure. And where are the wildlife crossings?

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

100% access routes, 100% isolation from motor vehicles across and between population centres

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?

Fix GreenPower!

Fix the accounting!

Stop double counting! Stop Government Greenwashing!

Create the rules in legislation to stop Corporate Greenwashing!

Adopt market based accounting in accordance with the GHG Protocol Scope 2 Guidance!

Demote Location based accounting to context and dual reporting only!

Governments to power their trains and trams with accredited renewable electricity!

Create catenary free light rail whereby carriage battery storage gets trams and trains through areas of trees so that they are not all cut down again as happened in Adelaide's and Canberra's light tram and train networks!

Establish independent anti greenwashing authorities to check government and industry claims

- 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?

Electrifying everything only works if it is achieved with accredited renewable electricity!

Getting trucks off roads only works if there is investment in Australia's rail corridors!

Biodiversity only continues when it is not in peril to be road kill or stranded.

The nation's Guardrail expansion has also gone to far and has become a major cause for roadkill. As vehicle assist technology increases, the need for much of this guard kill should be reassessed. Lengths of guard rail/guard kill should not be longer than 200 metres without a designed biodiversity escape.

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

Fix GreenPower as previously stated. Renewables are cheaper to produce. They should be cheaper to buy. The accounting frameworks have distorted the price

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

Yes

- 27 7.1 Please add details to your response.

Net zero is an unachievable aspiration but OK. First, GreenPower needs to be fixed. State and Federal Governments need to lead not greenwash.

Vehicles need to be repairable and built for 50 years not 5 years. They have developed to an unmanageable and unaffordable level of undesirable technology whilst necessary technology is still lagging.

- 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?

Fix GreenPower and make it affordable, not charged as 1 130% renewable penalty.

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

EVs need to be affordable to buy, affordable to run, affordable to fix and affordable to recharge with accredited renewable electricity or on site renewable electricity that is not double counted.

Also, there is a need to build the nations EV Repair capability. I bought a 2017 Nissan Leaf and it stopped recharging after a year. No one in Australia will help me fix the car. Nissan won't assist because I bought a second hand car that had been imported from Japan. When I get time I will need to tackle the charge controller myself. I got 3 additional months by fitting a diode behind the plug but the internals have further deteriorated. The EV is effectively a lemon and I am driving my 75 year old car instead.

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

Yes

- 31 9.1 Please add details to your response

Unachievable on a life cycle basis but as an aspiration OK. Needs to be described as such so it is not greenwash

- 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

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

Hydrogen goes bang. It is a small molecule that leaks through everything. It requires vast energy to produce by electrolysis and I have zero confidence that any of the clean green hydrogen projects have factored in the use of Accredited Renewable Electricity.

When Hydrogen is converted to anhydrous ammonia it is an awful chemical to have around. When burnt it produces a significant level of nitrous oxide emissions which are 310 times worse than carbon dioxide yet the combustion emissions rate is not being quantified. I regard the massive push for Hydrogen as Government ideological pursuit that would use greenwashing in its development.

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

Less

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?

Fix GreenPower

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

Not answered

37 13.1 Please add details to your response.

Low-carbon liquid fuel and renewable diesel to support emissions all sound like Greenwashing and without reform of the NGER accounting and NGA Factors I predict that they will be greenwashing

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

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

Battery electric is the option that is likely to be the most manageable option to be in a position to prevent greenwashing.

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

It depends and an answer is not possible for such a generic bundling of fuel options.

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?

Fix GreenPower, make it the single national renewable electricity product. Merge the proposed Renewables Guarantee of Origin Scheme with GreenPower rather than creating another competing scheme with accounting and greenwashing loopholes.

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

Fixing Greenpower would enable a low carbon transport plan to be legitimate and credible

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

Yes

44 17.1 Please add details to your response.

Unachievable but OK

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?

There is a global challenge to reduce needless shipping but it is difficult being tangled with economics and political agendas.

Mandate emission rates & bring back sails is probable a good step.

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 achievable or credible

48 19.1 Please add details to your response.

On a life cycle basis, the energy intensity required for large planes make it totally unrealistic to expect that net zero aviation could ever be achieved.

Phase out planes.

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.

That is a statement

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?

Prevent greenwashing in Government Policy

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

Yes

- 52 21.1 Please add details to your response.
Unachievable but OK for an aspiration
- 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?
Fix GreenPower
- 54 22.1 How would these actions address the identified challenges and opportunities to reduce transport infrastructure emissions?
They would make low carbon transport possible, credible and legitimate.
- 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?
Fix GreenPower.
Low carbon fuels cannot be made out of greenwash. The accounting and legislation is critical.
Life cycle accounting is essential, including for things like nitrous oxide emissions from ammonia combustion.
- 56 24. How should the use of low carbon liquid fuels (LCLFs) be prioritised across different transport modes over time to achieve maximum abatement?
Without greenwash
- 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?
Prevent greenwash. Engage with those that will say what needs to be said, rather than those that say what Government wants to hear.

- 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?
Fix GreenPower
- 60 26. What measures and metrics should be used to evaluate the final Transport and Infrastructure Net Zero Roadmap and Action Plan?
Greenhouse accounting and reporting in accordance with legislated frameworks that prevent greenwashing and double counting
- 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?
Level of accredited renewable electricity (Voluntary surrender of LGCs) to date
- 62 27. Do you have any feedback on the proposed review process?
Should have fixed the accounting 20 years ago so that plans/strategies like this could be progressed
- 63 28. Do you have any further feedback on the Consultation Roadmap and proposed pathways?
Fix GreenPower
- 64 28.1 Is there anything missing? Are the sections appropriately integrated? Is the Roadmap appropriately ambitious?
The roadmap is blindly ambitious without the GHG and renewables accounting frameworks to even understand what is plausible
- 65 29. Is there any further information or documentation that you wish to

be considered with your submission?

Fix GreenPower

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