

Transport and Infrastructure Net Zero Consultation Roadmap

Take the survey

Department of Climate Change, Energy, Environment and Water

Response received at:

August 5, 2024 at 5:05 PM GMT+10

Response ID:

sbm2fb77439e333d217174eb

- 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
Transport Workers' Union of Australia
- 4 Confirm that you have read and understand this declaration.
Yes
- 5 First name
Emily
- 6 Last name
Mead
- 7 Email
[REDACTED]

8 Phone

[REDACTED]

9 Who are you answering on behalf of?

Organisation

10 Organisation name

Transport Workers' Union of Australia

11 What best describes you or your organisation?

Union

12 What sector do you represent?

Heavy road vehicles (trucks, buses etc.)

Light road vehicles (cars, utes etc.)

Public transport

Other: "Aviation"

13 What state or territory do you live in?

New South Wales

14 Postcode

2000

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
TWU submission_Net Zero Roadmap.pdf
- 69 Upload a submission
Not answered
- 70 Upload supporting file
Not answered
- 71 Upload supporting file
Not answered

TWU submission: Transport and Infrastructure Net Zero Consultation Roadmap

TWU Submission
5 August 2024



CONTENTS

TWU BACKGROUND	1
EXECUTIVE SUMMARY	1
AVIATION	2
ITF Just Transition strategy	2
Consultation	3
Safe, secure work	3
Industry regulation	4
ROAD TRANSPORT	5
ITF principles	5
Role of supply chain clients	5
Safety	6
CONCLUSION	6

TWU BACKGROUND

The Transport Workers' Union of Australia (TWU) represents tens of thousands of men and women in Australia's aviation and road transport industries. With over one hundred years' experience, the TWU has been proactive in establishing industry standards that improve the lives and safety of transport workers, their families and the community. In road transport the TWU covers employees, contractors and owner-operators across waste, oil, fuel and gas, mining, retail, logistics, buses, ports and wharves, construction, tippers and concrete, cash-in-Transit, couriers and last mile delivery, food delivery and rideshare. The TWU also covers all workers in the aviation industry, including in ground and baggage handling, fleet presentation, airline catering, airport screeners, refuellers, cabin crew and pilots.

EXECUTIVE SUMMARY

The TWU welcomes the opportunity to the Department of Infrastructure and Transport on its Net Zero Consultation Roadmap. With membership across aviation and road transport, where significant work will be required to reach net zero by 2050, we know how critical it will be to engage workforces in the transition.

The TWU supports and recommends the government adopts a Just Transitions approach for both road transport and aviation. The International Transport Workers Federation (ITF) of which the TWU is a member has developed a plan that can be adapted to Australia.

Key principles embodied by the ITF's plan include worker safety, consultation, and the prioritisation of good, secure jobs throughout transitions. Though one of the Roadmap and Action Plan's guiding principles is to be "inclusive and equitable" to "ensure Australia has a workforce ready for net zero," there is little included in the roadmap on how workers will be involved in the transition. With both road transport and aviation already facing distinct but significant upheavals, the stability of these industries (and crucially, quality jobs) will be essential in decarbonisation efforts into the future.

AVIATION

As noted in the roadmap, Australia's aviation industry is critical to passengers, regional communities, tourism and businesses, connecting the country both domestically and internationally.

As it currently stands, Australia's aviation industry is prone to sudden shocks and has seen an extraordinary skills drain throughout the pandemic and more recently with the collapse of Bonza and administration of Rex. With privatised airlines and airports prioritising profits and executive bonuses, there is a need for a fundamental shift in how aviation does business to enable decarbonisation efforts through a reliable, experienced and consistent workforce.

Consultation with workers should therefore be a central feature of net zero plans. It should be noted that though the roadmap makes frequent mention of the Jet Zero Council, no union or worker representatives form part of this council. These voices are essential in enabling an engaged workforce that will be contributing significantly to the decarbonisation efforts as well as dealing with significant shifts to ways of working.

ITF JUST TRANSITION STRATEGY

The ITF sees a Just Transition strategy [1] as involving several key characteristics such as:

- Establishing a jobs plan for the aviation industry
- Ensuring adequate employment security
- Ensuring access to decent work
- Establishing equality for women and young workers
- Establishing robust health and safety protections
- Improving worker representation and voice by establishing Just Transition Committees with worker representation on all levels
- Increase investment into fossil-free fuels for aviation (such as SAF)
- To “leave no-one behind,” by changing the way that the current aviation industry does business in order to begin the journey towards making everyday aviation operations more sustainable

From these principles, the ITF has made several policy recommendations that the TWU urges the government to explore:

- To conduct a global industry-wide aviation employment study to understand the impact of climate change policies and new aviation technologies on jobs and to support better planning
- To establish strict measures on health and safety, to be built into the design phase of new propulsion systems such as hydrogen or battery powered aircraft
- To strengthen existing pathways for career progression and decent work for young workers, in apprenticeships and training pathways
- To find out if there are any gender-specific impacts of new technologies in the aviation industry and how these can be addressed
- The establishment of Just Transition Committees made up of workers at the national policy, corporate and airport-governance levels.
- The establishment, at an international level, of a Just Transition Civil Aviation Task Force, with representation from workers, their unions, employer groups and governmental bodies.
- To increase public investment into decarbonisation in the aviation sector and to increase public ownership of the aviation sector.
- For the governments and employers of the Global North to finance sustainable aviation efforts across all regions and for these government and employers in the Global North to accept lower growth rates and allow other countries in the Global South, higher growth rates.
- To ensure that the aviation industry does not rely on carbon offsets, carbon capture or storage technology.
- To encourage cooperation between governments, employers, investors and workers to immediately ramp up the production and usage of SAFs.
- To introduce new taxes to severely curb the use of private jets and introduce flight restrictions for any carbon-emitting private flights after 2030.
- To cease all development of commercial supersonic flights.

[1] International Transport Workers' Federation, A Zero-Carbon Future for the Aviation Sector:
<https://www.itfglobal.org/en/resources/zero-carbon-future-aviation-sector>

Contextualising the ITF plan for Australia, the TWU sees the following areas as key focuses for a transition towards net zero in aviation.

CONSULTATION

Workers are crucial stakeholders in transition efforts towards Net Zero, but as previously noted, no workers or union representatives make up the Jet Zero Council. It is crucial that workers play an active and engaged role at all levels to enable a just transition.

In a TWU survey, 89% of pilots said it was important for aviation workers to be represented and consulted when the government makes policy decisions about decarbonisation (52% of those saying extremely important).

Many have also offered practical suggestions that don't just depend on technological developments. These include:

- Fuel burn through improved departure and arrival procedures.
- More efficient air routes.
- Incentives to operate more efficient fleets.
- An engaged pilot workforce will have a large measurable impact on fuel efficiency, carriage, and burn

SAFE, SECURE WORK

Jobs in aviation which were once careers for life have become increasingly casualised, insecure, and transitory jobs.

A transition to Net Zero will rely on a reliable, experienced and consistent workforce, and crucially this will mean good, secure jobs and safety at work.

With regards to emerging technologies, the TWU urges the government to prioritise safety and testing. Many of TWU's pilot members have expressed safety concerns with the use of drones and their potential to cause an air crash. With the potential for there to be significant changes brought about by emerging technologies such as Sustainable Aviation Fuel (SAF) and hydrogen-powered aircraft for workers both above and below the wing, robust safety and labour standards must be in place to prepare and re-skill the workforce.

Even now, chronic understaffing and a lack of skilled, experienced workers is putting enormous pressure on workers leading to serious incidents, and raising considerable questions about passenger safety. Pilots and cabin crew, who are experiencing increasing in fatigue and poor work-life balance, must see decent safety outcomes to enable the shift in technologies.

In ground handling, safety issues are even more prominent. In September 2022, the TWU exposed a dossier of serious safety incidents at Swissport, which handles the bulk of Qantas outsourced ground work. Incidents included:

- Firearms unloaded onto arrivals carousels;
- Dangerous goods loaded onto planes without being documented;
- Cargo doors left open;
- Stairs removed while passenger doors open;
- Huge plane load imbalances;
- Staff working while injured; and
- Vehicles colliding with the refueling hose.

The TWU surveyed Swissport workers on safety, with disturbing results. The 165 respondents revealed:

- 81% were concerned about understaffing causing safety incidents
- 80% are concerned about inexperience from high staff turnover
- 95% have been fatigued at work
- 62% have been so fatigued they've worried about a safety incident occurring
- 80% felt under pressure to rush
- 41% have been injured at work
- Only 17% said they're trained on new safety procedures
- 44% said they find out safety procedures through word of mouth from coworkers

Without change to practices now, workers will be ill-prepared to deal with changes to working practices and technologies.

Workers also consistently raise issues of old or faulty equipment. Any electrification of ground vehicles and facilities will not only require investment, but decent safety standards and training.

Without good, secure, safe jobs in aviation, we will not see a workforce in the industry capable of enacting a transition towards Net Zero. But to ensure the prioritisation of decent jobs, aviation is in desperate need of regulatory oversight.

INDUSTRY REGULATION

To enable decarbonisation efforts, the aviation industry needs regulation through an independent decision maker to rebalance the scales and afford for decisions to be made in the public interest.

Without external regulation we've seen relentless "boom and bust" cycles in aviation. In just the past few months we've seen the collapse of Bonza and the administration of Rex. As well as hundreds of job losses, and further skills drain from an industry that will need a consistent and skilled workforce to enact decarbonisation, this has also meant the loss of ventures into new technologies.

As noted in the Roadmap, Rex was investing in electric propulsion systems through Australian start-up Dovetail Electric Aviation, which it had a 20% stake in. With battery electric and hydrogen-powered aircraft identified as key stages in the decarbonisation of aviation, the administration of Rex presents a real threat to progress that had been made.

While much of Australia's aviation industry now privatised, the government having an equity stake should be considered as a mechanism to secure the industry's future. The ITF has stated that public ownership models should be developed and promoted in key parts of the industry, including airlines, airports and air navigation operations.

Without external regulation, aviation will be governed by the excessive profit focus of privatised airlines and airports. With such a significant task ahead in the decarbonisation of the sector, the Federal Government must put in place an independent system that can enable decisions surrounding the transition to Net Zero to be made.

ROAD TRANSPORT

As noted in the roadmap, Australia's road transport industry contributes heavily to GDP but also to national emissions. With such complex supply chains and a diverse workforce, it will require work at all levels of the industry to contribute to decarbonisation efforts—but these efforts must be led by and invested in by clients at the top of the supply chain which hold the economic power in the industry.

The coming Road Transport Division, which will become active from 26 August, provides a significant opportunity to deal with issues of decarbonisation. With much of the industry having worked together to achieve these laws, the TWU will continue close partnerships with workers, employers and associations to create a safer, fairer, more sustainable industry.

ITF PRINCIPLES

As with aviation, the ITF has a series of principles [2] towards a just transition as follows:

- raising awareness of the essential contribution that professional drivers and operators make to societies and economies, and, hence, recognising the essential contribution that professional drivers make to the value chain;
- working together on systems to ensure that all actors in road transport contracting chains take responsibility for reducing emissions while ensuring the industry's overall viability, by ensuring labour standards for road transport workers, incentivise and support access to clean technology uptake, and drive efficiencies that contribute to emissions reduction.
- improving the image of the profession and ensuring recognition of transport operators and workers as co-designers of climate solutions;
- advocating for decent working conditions taking account of the escalating impacts of climate and change on health and safety (such as heat stress) and wider measures such as safe and secure parking areas, rest facilities and reducing border waiting times;
- facilitating the path to becoming a professional driver by improving the quality of training, skilling, re-skilling and retaining to meet current and future challenges specific to this sector;
- attracting young people and women to the profession as an essential part of the just transition process, whilst also facilitating access to the profession of those from different backgrounds, including through ensuring equal standards, pay and conditions and proper implementation of labour standards;
- providing proper talent management and development opportunities contributing to the net zero ambition of the road transport sector; and
- actively contributing to an open and constructive social dialogue between employers and workers at all levels, as an essential element of the democratic decision-making process, including tripartite dialogue at the national and global level between governments, employers and unions and initiate related pilot projects.

ROLE OF SUPPLY CHAIN CLIENTS

The Roadmap notes the median profit margin of road transport industry participants as just 2%, with the average truck age of 14.4 years well over that of other nations. Many owner-operators in particular operate on razor-thin margins and cannot be expected to invest in prohibitively-costed vehicles.

We've seen examples so far of industry investment producing positive results in this space. Team Global Express, working in conjunction with the TWU and the Australian Renewable Energy Agency (ARENA) under the Driving the National Fund, is conducting the largest trial of a heavy electric logistics fleet in Australia with a purchase of 60 electric vehicles.

To see large-scale investments into electric vehicles and other technologies we must see supply chain clients funding these projects or incentivising them through their contracts. This is certainly true for heavy vehicles but also for the increasing light vehicle market in last mile deliveries where workers often use personal vehicles.

[1] International Transport Workers' Federation, Just Transition for Transport Pledge:
<https://www.itfglobal.org/en/resources/just-transition-transport-pledge>

It will not just be issues of investment but of changes to work practices that must be funded from the top of the supply chain. With potential impacts on, for example, maximum vehicle usage because of recharging times, the onus must be on supply chain clients to make these transitions possible. With deadlines already so tight that drivers and operators are under pressure to speed, delay maintenance and skip rest breaks, it will not be financially viable for smaller businesses to absorb these extra costs.

SAFETY

With many emerging technologies in road transport yet to be tested, there is an urgent need to set out safety implications for workers and conduct testing in this space. The proposal of wider trucks to accommodate for battery weights should be subject to consultation of workers and transport operators, as well as broad testing.

Trucking is Australia's deadliest industry, and before ramping up decarbonisation efforts it's crucial we stabilise the industry to ensuring its ongoing sustainability. Without additional cost pressures from the transition, drivers and operators are under significant pressure across the industry. A 2021 TWU survey of 1,100 truck drivers working in freight, construction, and oil and gas found:

- 1 in 5 pressured to falsify logbooks
- 1 in 4 pressured to drive past legal hours and skip rest breaks
- 1 in 5 pressured to speed to meet deadlines
- 55% of owner drivers have delayed truck maintenance because they couldn't afford it
- 52% of drivers have experienced wage theft
- 42% of owner drivers didn't raise safety concerns out of fears they'd lose pay

As well as heavy vehicles, there are significant implications for the last mile sector.

With last mile deliveries set to become even more in-demand, and with their unique challenges of high-density dwellings and congested routes, there must be a particular focus on the needs of workers in this space. Suggestions of e-cargo bikes and scooters, as well as automated electric delivery buggies, will require extensive industry consultation, testing and planning.

There is a narrow window to ensure we don't fall into the same crisis brought on by the onslaught of the gig economy which, under the cover of innovative technology, destroyed good, secure transport jobs and killed seventeen food delivery riders in the space of 7 years.

With the last mile sector already in crisis with Amazon undercutting traditional operators, these are areas that require immediate intervention, and will be the subject of a first round of applications by the TWU when new laws take effect on 26 August.

CONCLUSION

Both aviation and road transport are areas that will require significant efforts to decarbonise, but also where it will be critical to stabilise the workforce and ensure good, secure jobs into the future to enable the transition.

Safety, consultation, and the prioritisation of good, secure jobs must be cornerstones of the Roadmap and Action Plan. At every level, workers must be involved in the transition.

The TWU welcomes the opportunity to play an active role in these efforts moving forward.



+61 2 8114 6500

www.twu.com.au

Level 9,
447 Kent Street
Sydney NSW 2000

Authorised by TWU National Secretary Michael Kaine