

12 April 2016

VIA Email to: vemissions@infrastructure.gov.au

Mr Mike Mrdak
Secretary
Department of Infrastructure and Regional Development
Level 6, 111 Alinga Street
CANBERRA ACT 2601

Dear Mike,

Vehicle Emissions Discussion Paper

Thank you for the opportunity to provide comment on the Vehicle Emissions Discussion Paper.

Since 2009, the National Transport Commission (NTC) has been publishing an information paper on new car carbon dioxide emissions intensity. We recently released the paper with the 2015 new car data. This report is available on the NTC website (www.ntc.gov.au) and will be a useful input for the vehicle emissions review.

The NTC is continuing to undertake strategic work in response to the outcomes of the 2015 Review of the NTC. Our strategic work called Land Transport Regulation 2040 that begins in 2016-17 asks the question: how should or could we regulate land transport in 2040?

As part of the Land Transport Regulation 2040, a follow-on question that we will be exploring is: can social media and direct consumer feedback replace some government regulation? This question is also relevant for the vehicle emissions review. For example, section 4.2.1 in the paper discusses the issue of tested versus real world emissions. Section 5.2 of the paper discusses information and education and the government regulation for labelling at point of sale to help inform consumers about the real world fuel efficiency or carbon dioxide emissions of vehicle models. The underlying problem is that consumers do not have the full information about the fuel efficiency they can expect after they have bought the car. In technical terms, this is known as an information asymmetry problem.

I contend that if we want to know about real world emissions, then the solution is to measure real world emissions rather than to rely on standardised tests. Today's technology means that there are more options available to tackle this problem.

For example, one option is to put the requirement onto manufacturers to measure and publicly report (say monthly) on real world emissions for a period of time (say for one year) a new vehicle model has been introduced into a market. This information will provide consumers with real world emissions performance.

Another option is for the manufacturers to build the functionality so that the consumers can post their real world performance to social media. This could be done by connecting the consumer's smart phone to the vehicle as this a common feature in cars today. This information could be aggregated by interested third parties and would help provide consumers with real world emissions performance data.

If your staff would like further information about this submission, they can contact Dr Neil Wong, Project Director - Strategy, Monitoring and Review, [REDACTED]
[REDACTED]

I look forward to the next phase of the vehicle emissions review.

Yours sincerely,



Paul Retter AM
Chief Executive and Commissioner