

From: [REDACTED]
To: [vemissions](#)
Cc: [REDACTED]
Subject: Comments regarding Vehicle Emissions Discussion Paper
Date: Friday, 8 April 2016 1:39:46 PM

Dear Vehicle Emissions Working Group

I am the RVCS Agent for Offroad Trucks Australia Pty Ltd who is an importer of N3/NC category heavy vehicles from Europe. All of which are off-road vehicles of ECE category N3G.

The comments below relate to ECE N3G vehicles:

1. What are the likely costs and benefits of adopting Euro 6 emissions standards for light vehicles and/or Euro VI emission standards for heavy vehicles?

A1.

- Euro VI engines and systems are heavier – Given Australia’s low front axle load limits compared to Europe, increasing the EURO level will make compliance with front axle load limits very difficult for heavy vehicles.
- Euro VI engines and systems produce more heat – Higher ambient temperatures in Australia compare to Europe is likely to require additional or larger cooling systems thereby increasing axle load further.
- For off-road vehicles eg ECE category N3G, both of the above are compounded by the heavier nature of offroad vehicles. The application of such vehicles in mining, exploration and in remote rough terrain areas is unlikely to have any significant impact in lowering overall emissions of the heavy vehicle fleet.
- In some cases EURO VI offroad vehicles will not be able to comply with axle load limits and therefore disappear from the market. Permitting offroad vehicles to remain at EURO V levels will keep the current vehicles in the market place with minimal impact on the emissions of the whole fleet, particularly in urban areas.
- Derating of engine performance due to emissions faults has created problems for trucks operating in outback and mining environments. We expect such issues will be increased with tighter emissions controls of EURO VI.
- In the case of fire fighting vehicles, derating engine performance in an effort to keep emissions low, particularly when compared to the emissions of a bush-fire, is a potentially life threatening hazard. Permitting a defeat device for fire and emergency vehicles or allowing a lower EURO level would remove this risk to life. I have tried to identify how this is achieved in Europe but there doesn't appear to be any EU wide regulations or exemptions, each member country has a different approach.
- In some cases EURO VI offroad vehicles will not be able to comply with axle load limits and therefore disappear from the market. Permitting offroad vehicles to remain at EURO V levels will keep the current vehicles in the market place with minimal impact on the emissions of the whole fleet, particularly in urban areas.

2. If Euro 6/VI standards were adopted, when would be an appropriate start date and why?

A2. Any emissions standards should only be introduced after they become mandatory in Europe. For example, new vehicles 12 months after EU introduction plus an additional 12 months transition for existing approvals.

4. Are there other ways governments could encourage the purchase and supply of vehicles that meet Euro 6/VI emissions standards?

A4. Offer increased front axle load limits that were more than the weight penalty of EURO VI systems.

20. At what point in the decision making process is information on vehicle efficiency most effective in influencing purchasing decisions and what information mediums are most effective?

21. What could governments do to improve the availability of data on fuel efficiency of used vehicles?

A20/21. Fuel efficiency is always a consideration in heavy vehicle purchase so most manufacturers provide this data. In my opinion, mandatory efficiency labelling like used on light vehicles will not aid sales of higher efficiency vehicles.

Regards

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