

The 3068 Group Pty Ltd



10th March 2017

Submission on Proposed Vehicle Emissions Standards And Fuel Quality Standards

There is far too much focus on the price of vehicles and the price of fuel.

“The Bureau of Infrastructure, Transport and Regional Economics undertook a benefit-cost analysis for each of the three proposed fleet average efficiency targets—phased in from 2020. The main benefit identified in the analysis was a reduction in fuel costs to the economy of \$10.8-\$27.5 billion. Additional benefits would arise from a cumulative reduction in greenhouse gas emissions of 25-65 million tonnes by 2030 and 91-231 million tonnes by 2040.”

There is insufficient attention to the latest research into the health impacts of vehicle emissions, small particulate matter in particular.

The research findings are alarming. Lung disease, heart disease and dementia are strongly correlated to increased exposure. The health costs are staggering.

Conventional cost-benefit analysis has not taken the latest health research into account. This will lead to flawed conclusions.

Vehicle emissions do not only affect drivers and passengers, but people who live and work in cities.

Another trend that the cost-benefit analysis has not taken into account is urban planning is directing residential development along busy roads. The strategy is promoted for its sustainability benefits compared to urban sprawl. This strategy is leading to more people living, growing up and working closer to increasingly congested roads. This will increase the exposure to air pollution.

See for example <http://www.abp.unimelb.edu.au/files/miabp/rob-adams.pdf>

The 3068 Group is calling on regulators to take heed of the health research and not be lulled by powerful special interests into accepting lower standards in Australia than exist in Europe.

Statements by the Australian Institute of Petroleum, that “Australia does not have an urban air quality issue.”, are untrue.

While Australian cities enjoy relatively clean air compared to the world's most polluted cities, this is no comfort when it is known that there is no safe minimum level of air pollution, and air pollution is estimated to cause far more premature deaths in Australia than the official 'road' toll.

<http://www.theage.com.au/victoria/alarmed-rise-in-deaths-from-air-pollution-20140820-10665r.html>

The cartel of Australian petroleum producers are using threats to bully legislators. Claims such as "potential closure of refineries presents a considerable cost risk to the community" should be taken for what they are - an industry that has no interest in cleaning up their product. The refineries are trying to hold the government to ransom. Their behaviour is completely unacceptable.

"It would require a commitment from our shareholder to invest significant capital, and in the current capital-constrained environment, such a commitment would not be guaranteed. A requirement to produce 10ppm sulphur petrol would thus threaten the financial viability of the Mobil Altona Refinery" - [Mobil Oil Submission](#).

Shareholders do not make executive decisions. And this is not a capital-constrained environment. Governments are promoting infrastructure development as good for the economy.

The refineries have been given an opportunity to present a case for retaining standards that allow poor quality fuel, and worse health outcomes. They have failed to present any arguments or evidence.

Improved fuel quality would improve pollution generated by the entire fleet. Mandating tougher emissions standards for new vehicles will have a negligible effect in the first decade as the average age of the fleet is 10 years.

Incentives to promote electric vehicles charged with renewable energy would gradually reduce the health impacts of road transport while also helping to meet Australia's commitments to reduce emissions - depending on how the electricity is generated.

Promoting alternative fuels is important because the Australian fuel refineries are not supportive of bringing their refineries up to world class standards. Incentives to promote public and sustainable transport over private vehicle use in cities should also be encouraged.

Heavy diesel vehicles should be banned from populated areas. Buses, by their nature work close to population centers. Diesel buses should not be operating in Australian cities.

Sincerely,



The 3068 Group



The 3068 Group is a residents group that covers the Postcode 3068 areas of Clifton Hill and Fitzroy North.