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10th March 2016

Vehicle Emissions Working Group
The Department of Infrastructure and Regional Development
GPO Box 594
Canberra ACT 2601 By email vemissions@infrastructure.gov.au

Dear Ministers,

Submission – Vehicle Emissions RIS

As I pointed out in my submission of 2016:

The Vehicle Emissions Discussions Paper essentially dismisses motorcycles as significant contributors to air pollution in Australia. Motorcycles account for around 1% of vehicle kilometres but significantly more than 10% of the vehicle emissions that cause smog and health concerns. CARB advises that motorcycles produce around ten times the emissions of a car.

It would be a very poor decision for Australia to continue to exempt motorcycles from emissions standards.

The arguments for ignoring the air pollution contribution of motorcycles in your discussion paper were specious. By their own admission, the authors of the discussion paper have conducted no research on the relative emissions of motorcycles, despite a wealth of readily available research.

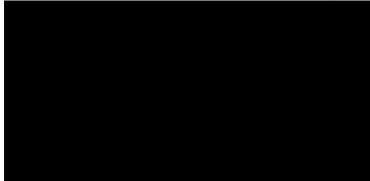
I provided some evidence, at least worthy of further consideration that

1. Motorcycles even in regulated markets, have far more emissions per hour than a small car.
2. That the unregulated motorcycles sold in Australia will not meet international emission standards by default as you assumed. Rather we import the variant for unregulated markets.
3. Motorcycles (on road) represent 9.7% of vehicle sales, but given their relatively high emissions, could well represent 20% of road emissions
4. That by moving from no standard to even 2010 USA or EU standards would dramatically improve air quality for almost not cost. It's another case of "low hanging fruit"
5. Non-road engines from lawn mowers to outboards will soon be regulated and it is inequitable to not regulate motorcycles. (NRSIEE)

No one cares to be ignored but this goes beyond that. Your apparent failure to consider this evidence is a failure of your key responsibilities, whether explicit or implicit in your terms of reference.

I look forward to your timely response.

Sincerely yours

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