



NISSAN MOTOR CO. (AUSTRALIA) PTY. LTD.

260-270 Frankston Dandenong Road,
Dandenong South, Victoria 3175
Australia
www.nissan.com.au

17 March 2017

Submission to Regulation Impact Statement: Vehicle emissions standards for cleaner air

Nissan Motor Co. (Australia) Pty. Ltd. has, as a member of the Federal Chamber of Automotive Industries (FCAI), contributed to the development of the *FCAI Response to Vehicle emissions for cleaner air Draft Regulatory Impact Statement*. Nissan supports the key points and positions included in the FCAI response, including:

- Vehicle pollutant emission standards need to be considered together with CO₂ standards or targets and fuel quality standards as they are all interrelated. This position is shared by many governments, research organisations and the global automotive industry.
- As there are multiple stages of Euro 6, and significant changes from Euro 5 to Euro 6d, there needs to be a staged implementation. The “new models” date cannot be before 10 ppm sulphur petrol is widely available and the “all vehicles” introduction date must be at least 5 years later and cannot be before the fuel standard aligns with EN Fuel Standards- including a maximum sulphur limit of 10 ppm for petrol
- If the Government wants to encourage the purchase and supply of petrol engine vehicles that meet Euro 6d emissions standards, 10 ppm sulphur petrol must be widely available in the Australian market otherwise, the benefits estimated using the results of the regulation certification laboratory testing will not be delivered on the road

Nissan: global leader in zero-emissions electric vehicles

Nissan is the global leader in zero-emissions vehicles. As part of the Renault-Nissan Alliance, the world’s fourth-largest automotive manufacturer, Nissan has sold more than 250,000 of its LEAF electric vehicle (EV), the world’s first mass-produced electric car that is also the best-selling EV in history.

Nissan: *Intelligent Mobility*

Nissan’s achievements with zero-emissions vehicles occur under its *Intelligent Mobility* program, which has two important goals: zero-fatality driving and zero-emissions driving, the latter first achieved with the market release of the Nissan LEAF electric car in 2010.

Draft RIS proposal and encouraging consumers to purchase low and zero-emission vehicles

The draft RIS considers that the greatest health benefits would be delivered through a new ADR 79/05 that mandated the Euro 6 pollutant emission standards that will commence in the European Union in September 2017, the Euro 6 pollutant emission standards that will be introduced into the EU from 1 September 2017 as European Commission Regulations and are not suitable to be introduced into Australia.

The draft RIS, Section 3.2.6 Option 6 – Mandatory standards (Euro 6/IV) for light and heavy vehicles (p. 27) include the following statement:

“Taking into account the international situation, the Department considers that if new ADRs were to be determined in 2017, a phase-in period of 2019-2020 would be the earliest practical timeframe without unduly disrupting business planning.”

This timing is not achievable for either the Government or the vehicle industry. Neither the new laboratory test cycle (Worldwide harmonised Light vehicle Test Procedure or WLTP) nor the new on-road test cycle (the European derived Real Driving Emissions test or RDE) and are yet to be included in United Nations Regulation No. 83 (UN R83).

The Government should carefully monitor the work being undertaken at United Nations WP29 in relation to WLTP and RDE and recognise that the first step of incorporating WLTP into UN regulations (R83 or other) is likely to be completed in the second half of 2018, only then will the much more difficult task of incorporating RDE in a global UN regulation can start and will take much longer.

Importantly, RDE was developed for Europe - including European traffic, average/maximum speeds and ambient temperature. If the RDE is to be introduced into the UN regulations, the Government needs to ensure Australian conditions are considered as part of a 'global' RDE.

Zero-emissions vehicles are, of course, the ultimate solution for the reduction of exhaust-related pollutant emissions from Australia's light-vehicle fleet.

The success of the Nissan LEAF electric car in regions such as North America, Europe, Japan and China is underpinned by the same two factors driving the wider consumer uptake of EVs overseas:

- Government-led purchase incentives for new-car consumers to select an electric car, and;
- Wide-spread publicly available electric vehicle recharging infrastructure, with full or partial funding from US or EU governments

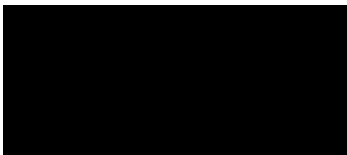
The local introduction of these two essential factors is certain to increase Australian consumer uptake of zero-emissions electric vehicles in a manner similar to the countries mentioned.

Conclusion

Nissan Australia supports the Australian Government's intention to coordinate a whole-of-government approach to improving the efficiency of light vehicles. As outlined in Nissan's submission, and detailed in the *FCAI Response to Vehicle emissions for cleaner air Draft Regulatory Impact Statement*, there is a range of areas that need to be considered to achieve the desired outcomes of the Ministerial Forum into Vehicle Emissions.

Nissan Australia welcomes the opportunity to participate in on-going Government-Industry consultation to deliver improvements in fuel efficiency of motor vehicles which are relevant to the Australian market conditions and contribute to the Government's overall post-2020 GHG reduction targets.

Yours sincerely,



Richard Emery

Managing Director and CEO

Nissan Motor Co. (Australia) Pty. Ltd.