
FCAI Feedback

Emissions Reduction and Resilience Plan

(Consultation Draft)

State of Play: Tasmania's Transport Sector



Federal Chamber of Automotive Industries

Level 1, 59 Wentworth Avenue

Canberra ACT 2604

Phone: +61 2 6247 3811

Facsimile: +61 2 6248 7673

Contact:

Mr Peter Griffin – Director of State & Territory
Advocacy & Communications

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OVERVIEW/ABOUT FCAI

The FCAI is pleased to provide initial feedback to the Tasmanian Government's Consultation Draft Emissions Reduction and Resilience Plan 2023-2028.

The FCAI represents more than 63 brands offering more than 400 models, sold, and serviced by almost 3,600 dealers. Australia's automotive sector is a large employer and contributor to the country's economy, lifestyle, and communities big and small.

Australia represents about one per cent of the total global automotive market. The range of vehicles supplied by member brands ranges from small passenger cars, SUVs and commercial vehicles with technology including internal combustion engines, hybrid, plug in hybrid through to fuel cell electric vehicles. At a global level, some member brands also are developing additional zero and low emission engine technologies which includes synthetic fuels for use in internal combustion engines.

FCAI believes that the principal policy objective is to reduce carbon dioxide emissions from the full range of vehicles on Australia's roads. For this reason, it believes that all available technologies be considered as a part of this transition to a zero emissions fleet. Policy settings that focus on only one technology miss the opportunity to reduce emissions in the short and medium term during this transition phase.

The FCAI also is the peak body for motorcycles and ATV (All Terrain Vehicles).

CONSULTATION DRAFT PLAN – FEEDBACK

From a broad perspective, the FCAI supports the directions outlined in the Consultation Draft as they relate to emissions from passenger cars, SUVs and Light Commercial vehicles (up to 3.5 tonnes). Specifically, this relates to the measures outlined in part 2: *‘Increasing the number of low emissions cars and other light vehicles on Tasmanian roads’*. The directions outlined are consistent with the objective to reduce vehicle emissions, are consistent with actions being taken in other jurisdictions across Australia while recognising the actions being taken at a Federal Government level.

The key points raised in the FCAI submission on 27 April 2023 providing initial feedback on the Government’s Emissions Reduction and Resilience Plan (Consultation Draft) remain unchanged.

Supplementary commentary is outlined below:

Priority Area 1

Increasing the Use of Public and Active Transport in Tasmania

In addition to being the peak representative organisation for companies that distribute new passenger and light commercial vehicles, the FCAI also represents motorcycles and all-terrain vehicles in Australia.

For the purposes of this submission the focus for this recommendation will relate to personal mobility, and more broadly congestion.

While the Consultation Draft does refer to electric bikes and scooters, the missing mode of transport is powered two/three wheelers (PTW’s), commonly referred to as motorcycles. By limiting personal mobility options to these two modes of transport means there is a gap in the strategy to fully canvass all viable options in terms of personal mobility and potential traffic congestion and emissions reduction solutions.

In the context of this submission, ‘motorcycles’ includes all popularly thought of forms and variants of ‘motor bikes’ and ‘scooters’, typically compliant with Australian Design Rules class LC, LM and LE, requiring a license to be driven on public roads.

Motorcycles are a proven solution to addressing congestion and vehicle emissions and may provide more practical options and convenience than either walking, cycling or public transport.

The FCAI request is that the Consultation Draft recognises the value of motorcycle use and where possible, include recommendations that promote the greater uptake of motorcycle use.

The FCAI also strongly recommends that motorcycles be exempted from any forms of congestion pricing, levies and charges given their inherent benefits in respect of parking, decongestion and reduced wear and tear of road infrastructure.

Consider Consistency of Regulation

During recent years, the introduction to the general public of a range of small electric mobility devices has continued unimpeded, and the uptake by the public has been enthusiastic. However, the lack of regulation of these products by government is somewhat perplexing. Products such as Pedalec bicycles, 'stand on' scooters, mono wheel scooters etc. are now all readily available to the public (at accessible prices), and people are taking advantage of these new 'short trip' mobility options.

The mixing of these mobility options in an unregulated manner has seen footpaths and bicycle paths become increasingly crowded and potentially unsafe, with these electrically powered devices mixing with pedestrians.

A motorcycle and a scooter both require the rider to have a licence to be legally ridden on the public road network. They cannot be legally ridden on footpaths or bicycle paths. Scooters and Mopeds must be registered, and the rider licenced and insured. Conversely however, an electric 'stand on' scooter, and other personal mobility devices (including electric bicycles) do not require any of these regulatory initiatives.

It is understood that there are certain power limitations on these alternative modes of transport. Also, lower powered products do not require licencing, registration, or insurance. However, the lines of differentiation between these vehicles are becoming less well defined, and their capabilities, such as increased speed and acceleration and range are now blurring the boundaries between products that need no regulation versus those that currently do.

The electric powered mobility products including sophisticated e-bikes (bicycles), some of which can travel at similar speeds to mopeds, remain unregulated, and are able to be used in pedestrian environments, including bicycle pathways, without requiring the rider to be trained, licenced, registered, or insured.

Motorcycles and Scooters are among the options available when seeking solutions to commuting in our sprawling cities, offering savings throughout the whole spectrum of moving people around our city.

The FCAI requests that they be considered as a part of the overall strategy to reduce emissions, reduce congestion and be acknowledged as a part of the overall Consultation Draft.

Priority Area 2

Increasing the Number of Low Emissions Cars and Other Light Vehicles on Tasmanian Roads

FCAI broadly supports the direction of the Consultation Draft with respect to increasing the number of low emissions cars and other light vehicles on Tasmanian roads.

As the Consultation Draft acknowledges, critical policy areas supporting this direction remain the responsibility of the Commonwealth Government. In particular, the Commonwealth Government's intention to introduce a nationally mandated fuel efficiency standard with the aim of reducing vehicle emissions and encouraging the increased availability of zero and low emission vehicles on Australian roads.

FCAI supports the introduction of a fuel efficiency standard and is working with the Commonwealth Government as it develops a standard. FCAI also supports the Government direction that a fuel efficiency standard should still allow Australian consumers access to the vehicles they choose to buy for work, recreation and family use at prices that remain affordable.

The Consultation Draft on p13 states that 'the primary barrier to EV uptake in Australia has been a lack of supply...'. This statement assumes that battery electric vehicles (BEVS) are available in all vehicle segments that consumers choose to buy. This is not correct. Currently, BEVs are currently available in mainly the Passenger segment or small SUV segment. As of October 2023, the Passenger segment accounted for 14.5 per cent of new vehicle sales in Tasmania year to date 2023. (VFACTS). SUV and Light Commercial sales YTD 2023 accounted for 81.6 per cent. The availability of BEV in these larger vehicle segments is currently extremely limited, and if they are available, the price can be a barrier for many consumers. That will improve during the coming decade as battery development and engineering work is done to develop these vehicles, however, due to product development cycles, that remains some years away. An efficient and ambitious national Fuel Efficiency Standard can support the future availability of the vehicles in the segments customers choose and at prices they can afford.

FCAI strongly supports action around public and private BEV recharging infrastructure. Ideally, consumer confidence in the availability and cost of charging infrastructure can be supported with mandatory reporting – ideally in real time – of the availability of recharging points and the cost to consumers. Consumer confidence is increasingly a concern for current and prospective owners of new vehicles, and steps to build this confidence is critical.

Acquisition of BEVs for Government fleets also is a key part of encouraging the uptake of the new technology and assist to create a second hand market for affordable vehicles for consumers moving into the market. FCAI acknowledges the steps being taken by the Tasmanian Government regarding fleet acquisition.

FCAI continues to support other action as outlined in the submission of 27 April 2023 specifically in relation to duty and registration waivers; smart charge grants; 'try and drive events'; the need for a trained workforce and the challenges and risks of parallel imports.

Electric Vehicle Working Group

The FCAI notes that the Tasmanian Government has established an Electric Vehicle Working Group. As the peak body for the OEMs (Original Equipment Manufacturers) operating in Australia, the FCAI will be pleased to offer its support as a member of this group. This would have the advantage of providing the Government with insight into the future direction of zero and low emission vehicle development globally and the longer-term application in Tasmania.

The FCAI seeks to work alongside the Tasmanian Government to support the continuing introduction of zero and low emission vehicles as a key element of reducing emissions and building a strong and resilient light vehicle sector that is to the long-term benefit to all residents of Tasmania.