



Emission Reduction and Resilience Plan – Transport

RACT submission to the consultation draft

December 2023

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The Royal Automobile Club of Tasmania

More than 215,000 Tasmanians are RACT members. We are the largest and strongest member organisation in Tasmania and an award-winning Tasmanian owned insurance company.

Established in 1923, RACT is an apolitical and independent transport infrastructure, road safety and mobility advocate. We increasingly advocate on the impacts of a changing climate and supporting improved community resilience. We are committed to supporting and furthering the interests of Tasmanians and we do this through a comprehensive program of consultation, education, awareness and public advocacy.

RACT is represented by senior staff in a number of stakeholder reference organisations in Tasmania and undertakes structured liaison with government and other stakeholder groups.

Nationally, RACT is a constituent member of the Australian Automobile Association (AAA), which represents some eight million Australians, and is represented on the board of the Insurance Council of Australia (ICA).

RACT is a regular contributor to the committees and forums of the AAA and the ICA.

Internationally, RACT has joined with other Australian motoring organisations as a member of the Fédération Internationale de l'Automobile (FIA) to work on road safety and related issues at a global level.

RACT's advocacy and public policy activity is defined by a series of policy documents developed and endorsed by the RACT Board.

These policies have been informed by history, experience, research, statistical analysis, consultation, industry knowledge and most importantly, through regular engagement with our member community.

Our submission

RACT welcomes the opportunity to make a submission on the Emissions Reductions and Resilience Plan for the transport sector presented by the Tasmanian Government. We recognise the Government's commitment to addressing the pressing issues of emissions and recognising the need for a sustainable, forward-thinking transportation strategy for Tasmania.

Our input is a representation of not only a 100 years' worth of insight and expertise in the transport industry, but also the voice of our member community which includes more than 215,000 Tasmanians.

In August 2023, the Tasmanian Policy Exchange in partnership with the RACT and The Mercury newspaper conducted a survey to better understand Tasmanians' attitudes towards options for reducing transport emissions in the state. This survey showed that 62% of respondents want ambitious transport emission reduction targets, with people under the age of 45 being most supportive.

This survey demonstrates Tasmanians have a strong desire to reduce their transport emissions and act on climate change, but have barriers including infrastructure, cost, and social attitudes that stand in the way.

RACT also distributed a member survey of its own where the results showed that 75% of respondents were very or somewhat willing to increase their use of public transport to reduce transport emissions. However, 65% of the participants stated that service limitations (e.g. limited trips, inconvenient and unreliable schedules etc.) is the number one factor that discouraged them from using public transport.

To address these barriers the Tasmanian Emissions Reduction and Resilience Plan (ERRP) for the transport sector needs to focus, among other things, on improving the safety of active transport options, increasing the quality of public transport services, reducing the cost of ZLEVs and supporting industry sectors on the transition.

RACT supports the release of the Tasmanian Government's Climate Action Plan and its commitment to develop ERRPs for key industry sectors, starting with transport. Effective action in this area requires a whole of community approach. The Tasmanian Government's commitment to seek input from various stakeholders, including RACT, demonstrates a dedication to transparency and inclusivity in the policymaking process, and we commend this approach.

The transport sector represents a key opportunity for Tasmania to reduce its carbon emissions. The approach we've taken in our submission is to constructively identify opportunities and possible ways to support our members and the wider community on their desire to reduce emissions.

RACT acknowledges the extensive list of activities and programs outlined in the plan. They provide an overview of work-to-date and logical future recommendations. However, if we as a community want to accelerate actions that reduce emissions, more specificity in terms of action, pathways and key metrics of progress will be required. RACT is encouraged the final document following consultation further articulates a prioritised and measurable action plan with pathways to inform and guide projects and support action and funding required for delivery. This type of framework is important to enable community and other sectors engage with confidence.

We note that community consultations for both the draft *Keeping Hobart Moving Plan*, and draft *River Derwent Ferry Service Masterplan* are underway. RACT will make submission on both plans in early 2024. The interdependency between these documents is absolute and we strongly encourage the Tasmanian Government to ensure alignment and shared delivery milestones across all three documents.

We also acknowledge the recent launch of the e-transport rebate programs that aim to encourage the uptake of EVs and reduce emissions in Tasmania.

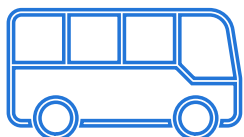
In this submission, we have addressed the priority areas as outlined by Renewables, Climate and Future Industries Tasmania, being:

- Increasing use of public and active transport in Tasmania;
- Increasing the number of low emission cars and other light vehicles on Tasmanian roads;
- Increasing the number of low emissions heavy vehicles on Tasmanian roads;
- Supporting the transport sector to transition to low emissions and build resilience, and;
- Supporting action through partnerships with governments, industry and other stakeholders.

A response to specific consultation topic areas with a focus on future opportunities is provided below.

Priority Area 1: Increasing the use of public and active transport in Tasmania.

RACT fully supports the importance on improving options of transport, in particular public and active transport.



A RACT Greater Hobart Travel Behaviour survey undertaken in 2018 found that 75% of respondents commuted to work by private vehicle, with 50% as a sole occupant. Only 8% were likely to travel by public transport in Greater Hobart. Tasmanians own more cars per capita than residents of any other Australian state or territory. RACT's own Great Hobart Mobility Vision gave a target of decreasing the proportion of people using a private vehicle by 4% - similar targets should be developed in coordination with other areas of government and aligned to emission reduction.

We encourage the Tasmanian Government to develop emission and participation targets and milestones for public and active transport performance that align with infrastructure and ticketing projects.

The Tasmanian Policy Exchange in partnership with the RACT and The Mercury newspaper conducted a survey that found improving the passenger experience through increased frequency (81%), greater reliability (79%), more options such as alternative transport and rapid buses (78%) and more routes (76%) would increase the likelihood to use public transport. With the rates of public transport use in Tasmania among the lowest in the nation, ensuring the public transport system (particularly in our urban centres) is fit for purpose against a core objective of increasing patronage is essential.

We acknowledge work being undertaken to address this issue, with plans to improve Hobart's major transit corridors with dedicated bus lanes, rapid bus services, park and ride facilities and other infrastructure upgrades. The Tasmanian Government is also investigating possible sites for new ferry terminals under the Derwent Ferry Masterplan following the success of the Bellerive-Hobart service. The need for these services, in addition to active transport corridors to interact and support a holistic travel experience, cannot be understated.

RACT supports, in principle, the investment in the public transport sector and associated education and behavioural change programs as a vital tool to shifting the public from the overuse of private vehicles to more efficient transport options. However, we note the underlying experience of public and active transport needs to improve for such investments to be successful.

A focus to provide more opportunities for people to have frequent direct and reliable services is key. The current draft *Keeping Hobart Moving Plan* hints at this but provides no details in terms of timeline or funding. The plan's implementation will be critical to the outcomes of patronage and the achievement of meaningful emission reductions. RACT will make specific comments in its response to this draft plan.

We fully support the move to an integrated ticketing system across all forms of public transport to improve user experience and encourage Tasmanians and visitors to increase patronage of the system. We encourage the Tasmanian Government to ensure the inclusion of non-frequent visitors in the new ticketing system implementation plan. A good example would be allowing visitors to utilise all forms of public transport without the need for a purchased card where everyone could simply pay with their phone.

We recommend coordinated, user centric and continued investment into active transport networks to provide attractive and safe options for Tasmanians to ride or walk between and within population centres.

The recent Tasmanian Policy Exchange survey undertaken in partnership with RACT, and The Mercury newspaper found that Safety Concerns (81%) are the biggest barrier to increased use of active transport (particularly cycling). Safety concerns are strongly interlinked with lack of access to infrastructure and poor-quality infrastructure.

The recent survey identified creating more cycling and pedestrian lanes that are physically separated from traffic (70%) closely followed by increasing the number of cycling and pedestrian lanes in general (65%) and creating continuous and connected cycling and pedestrian lanes (64%) are the key opportunities to increase participation. Developing green belts through our different urban areas as active transport corridors are optimum.

Tasmanians desire and need improved access to safe, continuous, and connected cycling and pedestrian lanes. A program of work that provides a holistic overview of the end state with staged projects delivering to the final solution showing connected projects is not currently readily accessible. The majority of Tasmanians want to use more public and active transport, but it is not reasonable to suggest people should drive less without proving high quality alternatives.

We also support enhancing and encouraging the existing last mile options including micromobility.

A heightened focus on options to enhancing and encouraging existing and future possible micromobility options, such as e-scooters, to provide convenient and sustainable last-mile solutions. Data from the Hobart City Council show there were 66 tonnes of CO² averted during the e-scooter trial period December 2021-November 2022. Such measures should be further considered and evaluated to understand their impact on the sector.

Priority Area 2: Increasing the number of zero and low emission cars and other light vehicles on Tasmanian roads.

Technology to transform our car and light vehicle fleets to zero and low emission vehicles (ZLEV) currently exists, while technology to decarbonise heavy vehicles and buses will become available over the coming years. While many factors influencing ZLEV uptake are outside the direct control of the Tasmanian Government (such as national vehicle emissions standards, vehicle availability and costs), Tasmania can and should be aiming at accelerating ZLEV uptake. RACT advocates a two-prong approach to reduce light vehicle impacts on the state's carbon emissions: Improving emissions standards; and increasing uptake of ZLEVs.

In addition to the proposed future opportunity areas in the consultation package we urge the Tasmanian Government to support national low emission vehicle standards.

RACT believe Tasmanians should have access to the best safe new car technology available and this should be as affordable as possible and result in an emissions reduction.

One of the most impactful immediate actions that can be taken to increase ZLEV uptake is the introduction of fuel emissions standards for Australia, and we support the Tasmanian Government in their role of advocating for this change with their Commonwealth counterparts.

The Climate Council says strong fuel efficiency standards could mitigate 31 million tonnes of harmful transport pollution in Australia over the years to 2035. Stronger fuel standards can also deliver up to \$13.6 billion in total benefits for Australians by 2035.

Enhancing the Australian Fuel Standards can be a vehicle in leading this change, our position on fuel emissions mirrors that of the Australian Automobile Association:

- There's a need for cleaner fuel standards, new vehicle Euro 6 noxious emissions standards and new vehicle fuel efficiency standards to be considered as a single, unified package to make sure every benefit and drawback of these associated actions are accurately recorded.
- The lack of an Australian standard is resulting in new vehicles models with improved fuel consumptions, lower tailpipe emissions and those using alternative energy sources not being prioritised for the Australian market. This risks Tasmanians not being able to access the most efficient and safest vehicles from manufacturers.

We urge the Tasmanian Government to develop milestones and programs that support all Tasmanians to move to zero and low emission vehicles (ZLEV). We encourage the investigation of specific focused activities to reduce social, informational, and cultural barriers to take up within key target markets.

We acknowledge the recent launch of the e-transport rebate programs that aim to encourage the uptake of ZLEVs and reduce emissions in Tasmania. The recent Tasmanian Policy Exchange conducted a survey – in partnership with the RACT and The Mercury newspaper found that 50.8% of Tasmanians are likely to purchase a ZLEV as their next vehicle. The survey found they were more likely to be women between 25 and 44, and 55 and 64 with an income less than \$80,000 per year. As such we encourage Tasmanian Government to develop ongoing and more equitable subsidies and discounts which support an increase of sales of these vehicles for all Tasmanians.

In addition to price, primary barriers for survey respondents to buying ZLEVs were, the accessibility of charging infrastructure in public (64%) and the home (44%), the availability of second-hand ZLEVs (54%), the driving range per charge (52%), and the range of models available (46%).

It is important for industries to have the confidence to plan and invest to support the transition to ZLEVs. We would encourage government to set key milestones in terms of sales and that are supported by consistent programs that encourage take up and remove barriers to support industry development.

A focus on increasing the Tasmanian Government vehicle fleet and other larger commercial fleets in Tasmania to ZLEV, where practical, should be a priority to reduce emissions and to build a future pool of second-hand vehicles. We support continued engagement with fleet managers on their needs and barriers to move to a low emission vehicle fleet.

RACT supports the need to work with utilities and the local government sector to support planning and efficiency of deliver of core infrastructure.

RACT encourages the Tasmanian Government to consider the management of potential cost impacts of upgrades to the energy network to Tasmanian households.

In addition, RACT urges the Tasmanian Government to work with the Australian Government to develop a new road user charging model to respond to the issues associated with declining fuel excise revenue.

The impact of a higher proportion of ZLEVs in Australia's vehicle fleet is resulting in less fuel consumption, and this will grow in conjunction with further expansion of this cohort of vehicles. This will ultimately result in less tax from the fuel excise. Regardless of vehicle type the need to fund road maintenance and improvements will need to be funded in a sustainable and equitable manner for all road users. There is a pressing need for the development of a new road user charge to ensure ongoing funding is available for the maintenance of roads and other facilities for all road users. Following the recent High Court of Australia ruling these measures will need to occur at a federal level.

Priority Area 3: Increasing the number of low emissions heavy vehicles in our transport network.

While recognising the significant economic issues and market influences outside the immediate control of Tasmanian Government in this area, we support the transition of the heavy vehicle industry to alternate fuels (including electric or hydrogen vehicles) as a form of reducing emissions resulting from the transport sector. We recognise in many instances technology is not as advanced nor readily available as in the light vehicle fleet.



RACT support programs that demonstrate and seek opportunities to support industry in the uptake of low emission heavy vehicles, and encourage the consideration of the impact of potentially heavier vehicles on road infrastructure.

Electric heavy vehicles are, in most cases, at least one tonne heavier than comparable internal combustion engine (ICE) heavy vehicles. This additional weight imposed on our road network can lead to accelerated wear and tear, requiring measures to assess and mitigate this impact when planning towards the sustainability of our road network. Understanding the implications of electric heavy vehicles on roads infrastructure is vital.

In addition, RACT support the investigation of more efficient heavy vehicle transport corridors or transit options around major urban areas.

Improving the operational efficiency for heavy vehicles using roads particularly in urban areas can present important emissions reduction opportunities. There is an opportunity to review medium-term road network planning as part of a wholistic area solution for possible options that may support a reduction of traffic for heavy vehicles offering productivity outcomes but reduces heavy vehicle emissions and peak hour pressures.

Priority Area 4: Supporting the transport sector to transition to low emissions and build resilience.

Climate change, including more extreme weather events, can pose threats to public transport infrastructure and networks. It is important that as part of considering emission reductions we also identify and consider mitigation measures that may be required to ensure future operation of our transport system.

In addition to the proposed future opportunity areas in the consultation package we support a risk assessment of impacts on the Tasmanian road network and the impacts of climate change, including fine scale climate projections.

RACT's annual member survey showed longer term climate related environment issues are one of the top three concerns for our members across Tasmania. Ensuring appropriate funding to identify and prioritise Tasmania's climate risks at a granular level that supports prioritisation and development of physical infrastructure and inform operational priorities for communities, emergency and other services is essential. A Tasmanian based assessment of our key risks is required to support this work.

Not only is this information and associated impacts (economic, social and cost) important for infrastructure planning, but will become key in the development of funding applications for access to Commonwealth funding.

We support the ongoing development of electric vehicle (EV) charging infrastructure to support peak and accessible residential charging options.

There currently more than 2880 registered electric vehicles in Tasmania, and a total of 124 public charging stations, equating to one charging station per 23 EVs, or one charging station per 145 kilometres of road, this is not taking into account station downtime due to maintenance. The nationally recommended approach is that there needs to be one charging station for every 10 EVs or for every 50-75kms of major roads and highways (Motor Trades Association Australia, 2022). Operations during peak times and availability in more remote areas of the state are still areas of real and perceived concern for current and potential users and a priority for short term development and education.

Nearly three quarters of respondents to the recent Tasmanian Policy survey said they would be more likely to purchase an EV if there was increased public charging infrastructure. Indicating that both the reality and perception of the current charging infrastructure in Tasmania requires both a development and educational focus.

The impact of peak traffic demands daily and seasonal (e.g., tourism peaks) on the EV charging infrastructure should be a focus, especially in popular tourist destinations and key stopping/rest spot locations. Performance Targets that address drivers’ current concerns around charging availability and times may be useful to measure performance and develop confidence in the network.

We encourage the Tasmanian Government to expand and enhance the EV charging infrastructure network through further investment to cater for peak periods and facilitate confidence in the network with consideration for rural communities.

Support planning considerations for EV charging in higher density development areas should be examined to ensure access to ‘home’ charge points into the future.

In consultation with the Visitor Economy, we encourage the government to continue the incentives provided for rental companies’ electric vehicle fleet.

Support the development of a sustainable and future labour force in the automotive industry.

Supporting the transport sector is an essential element of a transition to more EVs. The impending labour shortage in the automotive industry, including the electric vehicle sector is of concern. According to the Tasmanian Automotive Chamber of Commerce (TACC), there is a looming deficit of 31,150 skilled labour positions, estimated to rise to 38,000 by the end of 2023. To achieve the desired transition, there is a need for a workforce development plan with the industry, TAFE and Registered Trade Organisations (RTOs) consultation, accompanied with an appropriate investment in workforce development and training to meet the growing demand for EV-related skills.



Support the transition to EVs for government and fleet operators.

A focus on increasing the Tasmanian Government vehicle fleet and other larger commercial fleets in Tasmania to ZLEV, where practical, should be a priority to reduce emissions and to build a future pool of second-hand vehicles. We support continued engagement with fleet managers on their needs and barriers to move to a low emission vehicle fleet.

Priority Area 5: Supporting actions through partnerships with governments, industry and stakeholders.

As a member of the Australian Automobile Association (AAA), RACT is fully committed to partnering with various stakeholders to promote consumer understanding and support their vehicle purchasing decisions, including EVs. We firmly believe that by working closely with governments, industry representatives, and other stakeholders, we can provide the education and resources necessary to empower consumers to make environmentally responsible choices.

A good example is the recent release of the [EV Index](#), which tracks the uptake of EVs across all Australian jurisdictions and compares Australian market prices to those of the global market. Such tool can help consumers make a well-informed choice and gives them the confident to transition from an ICE vehicle to a more efficient vehicle. We have circulated the EV Index with our members through various communication channels as part of our ongoing approach of ensuring the members get the most suited and affordable option in their transition to electric vehicles.

We encourage the Tasmanian Government to engage with stakeholders who are leading in the technological solutions to transportation matters. Importantly as we increase ZLEV on our roads, disposal and management of these vehicles at end of life needs to be considered.



Importantly, there are many areas of government working to develop and deliver plans and future strategies that directly impact the outcomes of this emission reduction plan. Major projects such as mobility plans, additional ferry services need to deliver multiple benefits particularly in a small state such as Tasmania.

We would strongly support the Tasmanian Government in the development of an overarching vision and coordination of the current plans in working towards a clear outcome for Tasmanians. A vision supported by plans with qualitative, materialistic costs, accompanied by key success metrics for project outcomes across delivery areas- for example public transport enhancements could include outcome measures of emission reductions, productivity improvements, percent usage changes and resident liveability measures.

We firmly believe meaningful solutions are often born from collective input and diverse perspectives. RACT stands as an open and willing partner in this journey towards a more sustainable and resilient transport sector. We encourage all interested parties to engage with us to explore innovative ideas, share insights, and collectively develop actionable solutions that will benefit the entire Tasmanian community.