# Submission to the Department of Infrastructure and Transport

# in response to the *Discussion Paper on a new approach to comparing the environmental performance of vehicles on the Green Vehicle Guide*

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(28 Sep 2012)

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## EXECUTIVE SUMMARY

The Federal Chamber of Automotive Industries (FCAI) is the peak industry organisation representing vehicle manufacturers and importers of passenger vehicles, light commercial vehicles and motor cycles in Australia.

The industry has agreed to the introduction of mandatory $CO_2$ targets, and in the lead up to the 2010 election the Prime Minister announced the starting point for negotiations would be an industry average of 190 $gCO_2$/km in 2015 and 155 $gCO_2$/km in 2024. These targets equate to reductions in $CO_2$ emissions of 14% and 30% by 2015 and 2024 (respectively) from a 2008 baseline.

As the Government, is developing the Regulatory Impact Statement to introduce mandatory $CO_2$ targets, as a complementary measure to the Government's Clean Energy Future Plan, a whole of Government approach is required to incorporate all associated issues, including fuel quality standards, which have an impact on $CO_2$ emissions.

The Department of Infrastructure and Transport (DoIT) released a Discussion Paper proposing changes to the Green Vehicle Guide, to be introduced from 1 January 2013. The FCAI's positions on the proposed changes are;

- Support for removal of the overall star rating.
- Support the proposal to make the $CO_2$ emissions as measured in the ADR 81/02 certification test as the central element of the GVG.
- No objection to including of estimated fuel production $CO_2$ emissions, based on National Greenhouse Accounts provided that the GVG does not include a total estimated 'well-to-wheels' figure.
- Support removing the air pollution rating and including only the emission certification level based on the ADR air pollutant standard.
- No objection to retaining ADR 83/00 Stationary Noise results recognizing that this information is used by State/Territory governments and no other source is available at this time.
- Support the removal of the safety information as this is no longer necessary, does not include the newer safety technology now being provided in new cars.
- No objection to including a link to the ANCAP website.
- No objection to including other information on vehicle environmental impacts provided these are objective sources.

The FCAI recognises that the Green Vehicle Guide provides a centralised resource for customers on the environmental performance of vehicles and that this is beneficial particularly in being able to compare different models. While the predominant focus of the GVG is on new vehicles and the original purchase decision (consistent with the emphasis of the fuel consumption label of ADR 81/02), the FCAI suggests that there is an opportunity to also highlight the importance of vehicle owners opportunities to reduce fuel consumption, e.g. vehicle usage and the importance of regular maintenance.

Addressing the environmental consequences of transport is best achieved by an integrated policy approach that looks at both new and in-service elements, and the importance of market fuel quality (especially sulphur levels in market petrol) needs to be recognised.

## 1.0 INTRODUCTION

The DoIT released on Discussion Paper on 19 July 2012 titled "Discussion Paper on a new approach to comparing the environmental performance of vehicles on the Green Vehicle Guide."

The Discussion paper proposed some significant changes to the current method of evaluating the performance of vehicles and presenting the information. The Discussion paper has a short timeframe for public consultation with a closing date for submissions of 30 September 2012 with proposed introduction timing of 1 January 2012.

The industry has agreed to the introduction of mandatory $CO_2$ targets, and in the lead up to the 2010 election the Prime Minister announced the starting point for negotiations would be an industry average of 190 $gCO_2$/km in 2015 and 155 $gCO_2$/km in 2024. These targets equate to reductions in CO2 emissions of 14% and 30% by 2015 and 2014 from 2008.

As the Government, is developing the Regulatory Impact Statement to introduce mandatory CO2 targets, as a complementary measure to the Government's Clean Energy Future Plan, a whole of Government approach is required to incorporate all associated issues, including fuel quality standards, which have an impact on $CO_2$ emissions.

## 2.0 DISCUSSION PAPER PROPOSALS

The Discussion Paper proposes the following changes to the Green Vehicle Guide (GVG) to be introduced from 1 Jan 2013:

- Remove the overall star rating.
- Make the central elements of the GVG the $CO_2$ emissions (in g/km) and fuel consumption (in L/100km) based on ADR81/02 certification results.
- Include estimated fuel production $CO_2$ emissions, based on factors from the National Greenhouse Accounts.
- Remove air pollution rating, and include the emission certification level (i.e. Euro 4, 5 or 6) based on the equivalent ADR air pollutant emission standard (i.e. ADR79/02, 79/03 or 79/04) to which the vehicle is certified.
- Retain noise level information, as currently provided and submitted based on test results from ADR83/00.
- Remove safety information currently available and replace with a link to the ANCAP website.
- Retain the other information currently available on the Guide, obtained through other objective sources, including fuel production $CO_2$ emissions column (to provide information to consumers about life cycle emission from all fuel types, including alternative fuel and electricity); annual fuel cost column.

## 3.0 OVERVIEW OF FCAI RESPONSE

The FCAI welcomes the opportunity to provide comment on the Discussion Paper on a new approach to comparing the environmental performance of vehicles on the Green Vehicle Guide.

In summary the FCAI position on the changes proposed in the GVG are;

- Support for removal of the overall star rating.
- Support the proposal to make the $CO_2$ emissions as measured in the ADR 81/02 certification test as the central element of the GVG.
- No objection to including of estimated fuel production CO2 emissions, based on National Greenhouse Accounts provided that the GVG does not include a total estimated 'well-to-wheels' figure.
- Support removing the air pollution rating.
- No objection to retaining ADR 83/00 Stationary Noise results recognizing that this information is used by State/Territory governments and no other source is available at this time.
- Support the removal of the safety information as this is no longer necessary and does not include the newer safety technology now being provided in new cars.
- No objection to including a link to the ANCAP website.
- No objection to including other information on vehicle environmental impacts provided these are objective sources.

The FCAI recognises that the Green Vehicle Guide provides a centralised resource for customers on the environmental performance of vehicles and that this is beneficial particularly in being able to compare different models. While the predominant focus of the GVG is on new vehicles and the original purchase decision (consistent with the emphasis of the fuel consumption label of ADR 81/02), the FCAI suggests that there is an opportunity to also highlight the importance of in-service issues as well, e.g. vehicle usage and the importance of regular maintenance.

Addressing the environmental consequences of transport is best achieved by an integrated policy approach that looks at both new and in-service elements, and in this the importance of market fuel quality (especially sulphur levels in market petrol) needs to be recognised.

NOTE: Individual FCAI members may provide separate submissions expressing a different view to the FCAI position expressed above.

## 4.0 OVERVIEW OF THE AUSTRALIAN AUTOMOTIVE INDUSTRY

The FCAI is the peak industry organisation representing vehicle manufacturers and importers of passenger vehicles, light commercial vehicles and motor cycles in Australia.

The automotive industry is a major contributor to Australia's lifestyle, economy and community and is Australia's largest manufacturing industry. The industry is wide-ranging – it incorporates importers, manufacturers, component manufacture and distribution, retailers, servicing, logistics and transport, including activity through Australian ports and transport hubs.

The Australian automotive sector exported around $3.3 billion in vehicles and components in 2011 and annual turnover in the industry exceeds $160 billion. At present, the industry directly employs almost 52,000 people through Australia's three vehicle manufacturers, dozens of importers and thousands of related component manufacturers. Further, the automotive industry employs nearly 280,000 people directly and indirectly throughout Australia. Around $470,000 worth of product is generated per employee, a significant contribution to the Australian economy. The industry paid around $3 billion in wages and salary in 2009/10 and since 2007 the industry has invested more than $4.5 billion on research and development.

As the tariff barriers on automotive products have reduced from 57.5% in the 1980's to between 3 and 4% the number of vehicle brands and models in the Australian market has increased.

There are now over 60 brands in the Australian market, with just over one million new vehicle sales per year. That is a lot of brands to service a market of our size equating to 15,757 new vehicles sold per brand. The following table provides a comparison of the competitiveness of global markets with double the number of new vehicles sold per brand in Canada, almost three times as many in the UK and more the 230,000 new vehicles sold per brand in the USA.

**Table 4.1 Competitiveness of Global Vehicle Markets**

| | Australia | Canada | UK | USA |
|---|---|---|---|---|
| **No. of brands in market** | 64 | 48 | 54 | 51 |
| **Sales** | 1,008,437 | 1,583,388 | 2,293,576 | 11,772,220 |
| **Market size per brand** | **15,757** | **32,987** | **42,474** | **230,828** |

It has become much easier to afford a new car since the mid-1990s, as earnings growth has exceeded the movements in motor vehicles prices. Motor vehicles are more technologically advanced today than ever before. Whilst the structural changes in the Australian market, in terms of lower tariffs and more brands, has resulted in significant consumer benefits with improved affordability and choice it has also greatly increased the knowledge base required of repairers. The repair industry has had to change to compete in this global market place and cannot slow the rate of adoption of these technologies, or limit consumer choice.

The expansion of new and global brands and models into the market has led to the introduction of advanced security, safety and environmental features in motor vehicles. The introduction of these features is in response to increasingly strict environmental regulations and growing demands from consumers for advanced security and safety features.

Vehicle brands face a range of pseudo regulations in the form of safety and environmental star ratings and buyer requirements. They face a range of competitive pressures to continually improve environmental performance and safety standards. For example, around 30-50% of vehicle sales are sold to governments and fleets that frequently require a 5 star ANCAP rating and/or 4 star GVG rating. If a vehicle model falls beneath these standards it is possible fleet managers will no longer include these vehicles in the pool of vehicles for purchase.

## 5.0 VEHICLE EMISSION AND FUEL QUALITY STANDARDS

Vehicles are developed to meet vehicle emission standards with an expectation of fuel quality in a particular market. During the design and durability phases of development, the local market fuel parameters need to be specifically considered to ensure the vehicle operates to the expectations of both the owner and manufacturer and meet any regulated $CO_2$ targets and pollutant emission standards.

Australia is a relatively small market for most brands, and has a market fuel standard that is of lower quality than the certification fuel for the regulated $CO_2$ targets and pollutant emission standards (i.e. Euro 5/6).

### 5.1 $CO_2$ TARGETS

The industry has agreed to the introduction of mandatory $CO_2$ targets, and in the lead up to the 2010 election the Prime Minister announced the starting point for negotiations would be an industry average of 190 $gCO_2$/km in 2015 and 155 $gCO_2$/km in 2024. These targets equate to reductions in $CO_2$ emissions of 14% and 30% by 2015 and 2014 from 2008.

The Australian Government is currently developing a Regulatory Impact Statement to introduce mandatory $CO_2$ targets[1] for light vehicles as part of the Government's Clean Energy Future Plan;

> *"In July 2011, the Government announced its* Clean Energy Future *plan to reduce $CO_2$ emissions across all sectors of the Australian economy. The Government will achieve this through introducing a carbon price into the Australian economy and through implementing a range of complementary measures."*

In its recent submission to the government (Department of Infrastructure and Transport (DoIT)), the FCAI noted that as $CO_2$ emission standards are a complementary measure to the Government's Clean Energy Future Plan, a whole of Government approach is required to incorporate all associated issues, including fuel quality standards, which have an impact on $CO_2$ emissions.

### 5.2 FUEL QUALITY STANDARDS

The Australian Government has introduced the European (Euro) vehicle emission standards with introducing timings outlined in Table 5.1 (below).

[1] Australian Government, Department of Infrastructure and Transport, *Light vehicle $CO_2$ emission standards for Australia, Key Issues - Discussion Paper 2011.*

**Table 5.1 Introduction timing of Euro 5 and Euro 6**

| Emission Standard | | Light petrol, LPG and NG vehicles | | Light diesel vehicles | |
|---|---|---|---|---|---|
| | | New models | All models | New models | All models |
| Euro 5 (stage 1)[2] | ADR 79/03 | 1/11/13 | | 1/11/13 | |
| Euro 5 (stage 2) | ADR 79/04 | | 1/11/16 | | 1/11/16 |
| Euro 6[3] | ADR 79/05 | 1/7/17 | 1/7/18 | 1/7/17 | 1/7/18 |

## 5.3 WORLD WIDE FUEL CHARTER

The Australian Design Rules are harmonised with the UN-ECE Regulations, and more than 80% of vehicles sold in Australia are imported (see Appendix 1). Consequently, , harmonisation of Australian fuel quality standards with the World Wide Fuel Charter[4] (WWFC) and/or European fuel standards is necessary to achieve the improvement in fuel consumption and reduction in pollutant emission outcomes that the Australian government aims to achieve with $CO_2$ targets and the introduction of Euro 5/6 vehicle emission standards.

[2] The "stage 1" Euro 5 requirements which apply in ADR79/03 require compliance with all the technical requirements of UN Regulation 83/06 except that ADR79/03:

- allows the provision of PM mass emissions data based on the previous UN R83/05 (Annex 4) Type I test procedure (with a PM mass emissions limit of 0.005g/km) in lieu of data collected under the revised test procedure (Annex 4a of UN R83/06) which specifies a limit of 0.0045g/km);
- accepts a relaxed OBD threshold limit (80mg/km) for PM mass for M and N category vehicles of reference mass >1760kg;
- does not require compliance with the PM number limit specified for diesel vehicles in UN R83/06;
- does not require compliance with the In Use Performance Ratio for OBD systems in UN R83/06;
- does not require the NOx monitoring for petrol vehicles specified in UN R83/06; and
- only requires flex fuel vehicles to meet the Type VI test when tested on petrol (details of requirements for flex fuel vehicles to meet the Type VI test under ADR79/04 and ADR79/05 at low temperature to be determined by 31 December 2011).

[3] ADR79/05 will be formally determined by the Minister when UN Regulation 83 has been amended to incorporate the Euro 6 standards.

[4] The World Wide Fuel Charter and the represent the best collective assessment of fuel quality required for vehicle engines to operate as designed. The data contained in the documents are based on the experience of all major vehicle and engine manufacturers and is intended to promote understanding of the fuel quality needs of motor vehicle technologies. Importantly, the WWFC matches fuel specifications to the needs of engines and emission technologies designed for various major markets.

The FCAI considers that Australia is a Category 4 country under the WWFC[5], i.e.

> "*Markets with further advanced requirements for emission control to enable sophisticated NOx and particulate matter after-treatment technologies. For example, markets requiring… EURO 4, EURO 5 Heavy Duty, or equivalent emission standards."*

The main differences between the current Australian fuel quality standard, the WWFC Category 4 fuels and EU fuels for petrol and diesel are outlined in Tables 5.2 and 5.3 below.

**Table 5.2 – Differences in Petrol Parameters**

| Parameter | WWFC – Cat 4 | EU Fuel Standard | Australian Fuel Standard |
|---|---|---|---|
| Sulphur content | 10 ppm (max) all grades | 10.0 ppm<br>(from 1 Jan 09) | 150 ppm (max) ULP<br>50 ppm (max) PULP |
| Olefins | 10.0% (max) v/v | 18% (max) by volume | 18% (max) by volume |
| Aromatics | 35.0% (max) v/v | 35.0% (max) v/v | 42% pool average over 6 months with a cap of 45% |
| Research Octane Number | | 95.0 (min) | 91.0 (min) ULP<br>95.0 (min) PULP |
| Motor Octane Number | 82.5 (min) '91 RON' | 85.0 (min) '95 RON' | 81.0 (min) ULP<br>85.0 (min) PULP |

The petrol fuel quality standard is important to achieve the desired emission outcomes. With the growing inclusion of direct injection gasoline technology to deliver improved fuel consumption, 10 ppm sulphur enables and promotes the use of lean NOx traps. Sulphur is stored on the lean NOx trap and high temperature regeneration is required to remove the sulphur. The higher the sulphur level in the fuel, more frequent regeneration is required, resulting in a higher $CO_2$ penalty, higher emissions and reduced life of the NOx trap.

[5] World Wide Fuel Charter, Fourth Edition, September 2006

**Table 5.3 – Differences in Diesel Parameters**

| Parameter | WWFC – Cat 4 | EU Fuel Standard | Australian Fuel Standard |
|---|---|---|---|
| Cetane Index | 55.0 (min)<br>(52.0 min when cetane improvers are used) | | 46 (min) |
| Cetane Number | 55.0 (min) | 51 (min) | |
| Derived Cetane Number (of diesel containing biodiesel) | Meet the relevant WWFC limit. | | 51.0 (min) |
| Density | 820 kg/$m^3$ (min) | 820 (min) to 845 (max) kg/$m^3$ | 820 (min) to 850 (max) kg/$m^3$ |
| Distillation T95 | 340$^o$C (max)<br>(or 320$^o$C at T90) | 360$^o$C (max) | 360$^o$C (max) |
| Polyaromatic hydrocarbons (PAHs) | 2.0% (max) m/m | 11% (max) m/m | 11% (max) m/m |
| Flash point | 55$^o$C (min) | | 61.5$^o$C (min) |

Some FCAI member companies are marketing diesel light vehicles that are European specification vehicles. Not providing a fuel quality standard for in-service fuels may not deliver the expected reduced emissions and result in operability problems (i.e. the vehicle may not operate as designed/expected) leading to owner dissatisfaction and impacting on brand reputation.

The FCAI and member companies are very aware of our responsibility to make a contribution to the reduction in $CO_2$ emissions. FCAI members consider that the lack of appropriate fuel standards could result in fuel consumption targets not being achieved in-service and subsequently, the government's policy intention to reduce $CO_2$ from light vehicles will also not be achieved.

## 6.0 FCAI RESPONSE ON DISCUSSION PAPER QUESTIONS

The FCAI will address the details in *Section 3. Proposed new approach for providing consumer information on the GVG.*

The FCAI's response on the various technical details will need to be cognisant of the other Government policies and regulations that have (and/or are expected to) a substantial impact on vehicles (i.e. exhaust emission and $CO_2$ targets as outlined in Section 5 above) and consequently FCAI members ability to meet these regulations, and deliver the expected benefits of reduced pollutant emissions and reduced fuel consumption in-service.

### 6.1 PROPOSED APPROACH

The Discussion Paper proposed to use $CO_2$ emissions (as determined via the ADR 81/02 test cycle) as the principle basis for comparing the environmental performance of new vehicles.

*Discussion Paper Question:*

1. *Would you find information presented in this way useful in assessing the environmental performance of vehicles?*

The majority of FCAI members support the proposal to use the $CO_2$ emissions, as determined in the ADR 81/02 test cycle, as the principle basis for comparing the environmental performance of vehicles due to;

- Improvements in exhaust emissions from modern light vehicles.
- The Government's major policy focus to reduce $CO_2$ emissions.
- De-rating of vehicles GVG star rating with the introduction of new emission standards creates confusion among users of the GVG.

There have been rapid improvements in pollutant emissions with the introduction of light vehicles that comply with the international exhaust emission standards into Australia. Consequently, including the exhaust emission standard in the GVG rating provides only little value to the consumer.

Additionally, with the governments more recent focus on the reduction in $CO_2$, utilising the $CO_2$ emissions as the principle basis for comparing the environmental performance of vehicles would be consistent with other government policies. For example, $CO_2$ emission targets have been identified by DoIT as a complementary measure to the Government's Clean Energy Future plan, as outlined in *Section 2 Context* of your Department's 2011 Discussion Paper;

> *"In July 2011, the Government announced its Clean Energy Future plan to reduce $CO_2$ emissions across all sectors of the Australian economy. The Government will achieve this through introducing a carbon price into the Australian economy and through implementing a range of complementary measures."*

Thirdly, the past practice of de-rating existing GVG scores with the introduction of new mandatory emission standards (e.g. introduction of ADR 79/02 and 79/03) has resulted in confusion among users of the GVG with adverse impacts including;

- Removal of vehicles from fleet purchasing lists
- Increase in stamp duty payable.

NOTE: Individual FCAI members may provide separate submissions expressing a different view to the FCAI position expressed above. For example, some vehicle brands may indicate support for continuation of a star rating and retention of the air pollution rating.

## 6.2 REPORTING OF FUEL CONSUMPTION AND $CO_2$ EMISSIONS

The discussion paper proposes to include information on the $CO_2$ emissions from the production of various transport fuels, at a vehicle level, based on factors from the National Greenhouse Accounts.

*Discussion Paper Question:*

2. *Do you consider the proposed approach for comparing the greenhouse performance of new vehicles based in the ADR $CO_2$ emissions value in g/km will satisfy consumer needs?*
3. *Do you consider that the proposed approach to providing information on the lifecycle emissions from the production of transport fuels is appropriate?*

As noted above, the majority of FCAI members support the proposal to use only the $CO_2$ emissions, as determined in the ADR 81/02 test cycle. However, the FCAI acknowledges that $CO_2$ emissions occur during the production of various petroleum and gaseous transport fuels.

As pointed out in the Discussion Paper, there are a range of production scenarios that will impact on the final amount of $CO_2$ emissions during the production of transport fuel. Consequently, using an Australian wide average will not provide accurate or meaningful information on the fuel production $CO_2$ emissions that would be relevant to an individual consumer who is attempting to use the GVG.

The FCAI has no objection to including information from the National Greenhouse Accounts on the $CO_2$ emission from the production of various transport fuels provided;

- The GVG does not provide 'total' $CO_2$ emissions for a vehicle, i.e. combining the $CO_2$ emissions from the ADR 81/02 test and also the fuel production emissions.
- The GVG provides sufficient detail to allow GVG users to identify the fuel production $CO_2$ emissions that are relevant to their particular situation.

## 6.3 AIR POLLUTANT EMISSIONS

The Discussion Paper outlines that DoIT considers that the emission standard (i.e. *Euro* certification level) rather than the test results for each air pollutant is the most appropriate basis for comparing air pollution emission performance of vehicles.

*Discussion Paper Questions:*

4. *Do you agree that air pollution is still an important consideration in comparing the environmental performance of vehicles?*
5. *Do you agree that stating the Euro certification level (Euro 4, Euro 5 or Euro 6) would provide an effective means to compare the air pollution performance of vehicles?*

The FCAI agrees that the emission level is an important consideration in comparing the environmental performance of vehicles. However, providing information on the certification level (e.g. '*Euro'* level or relevant ADR 79/..) is not an effective means of providing this information. It is possible for a model or variant to exceed the pollution levels of a later certification (i.e. '*Euro*') level. Vehicle brands may not be in a position to certify these variants to the later (and more stringent) certification levels. The 'whole of vehicle' certification process used in Australia makes it complicated to manage and control a separate emission certification level for a single variant.

The air pollutant emission standards, ADR 79/03 or ADR 79/04 (i.e. Euro 4 or Euro 5) are very complex standards that produce a result demonstrating that the vehicle will continue to comply with the standards for a prescribed operating life (based on certain assumptions). Additionally, the relative improvement in environmental performance with each new emission standard is diminishing. The relative reduction in pollutant emissions from ADR 79/03 to ADR 79/04 (Euro 4 to Euro 5 and potentially Euro 6) is significantly lower than the improvement than the previous change from 79/02 and then to 79/03 (i.e. Euro 3 to Euro 4).

**Table 6.1 – Differences in Diesel Parameters**

| | **Limit Values (g/km)** | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | CO | | THC | | NOx | | THC+NOx | | PM |
| ***Emission Standard*** | Petrol | Diesel | Petrol | Diesel | Petrol | Diesel | Petrol | Diesel | Diesel |
| ***Euro 2*** | 2.2 | 1.0 | - | - | - | - | 0.5 | 0.7 | 0.08 |
| ***Euro 3*** | 2.3 | 0.64 | 0.20 | - | 0.15 | 0.50 | - | 0.56 | 0.05 |
| ***Euro 4*** | 1.0 | 0.50 | 0.10 | - | 0.08 | 0.25 | - | 0.30 | 0.025 |
| ***Euro 5*** | 1.0 | 0.50 | 0.10 (0.068) | - | 0.06 | 0.18 | - | 0.23 | 0.0045 |
| ***Euro 6*** | 1.0 | 0.50 | 0.10 (0.068) | - | 0.06 | 0.08 | - | 0.17 | 0.0045 |

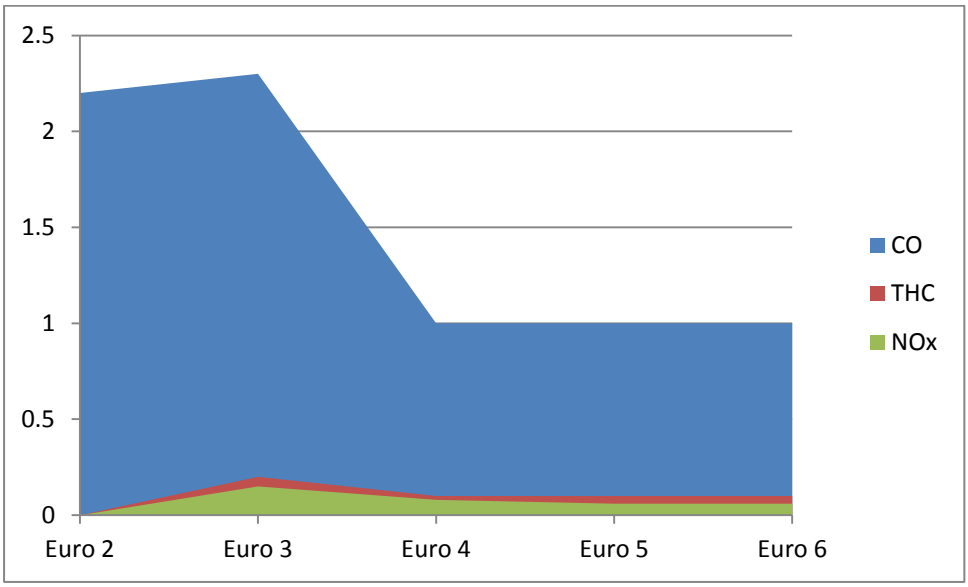


**Figure 6.1 – Petrol engine emission standards**

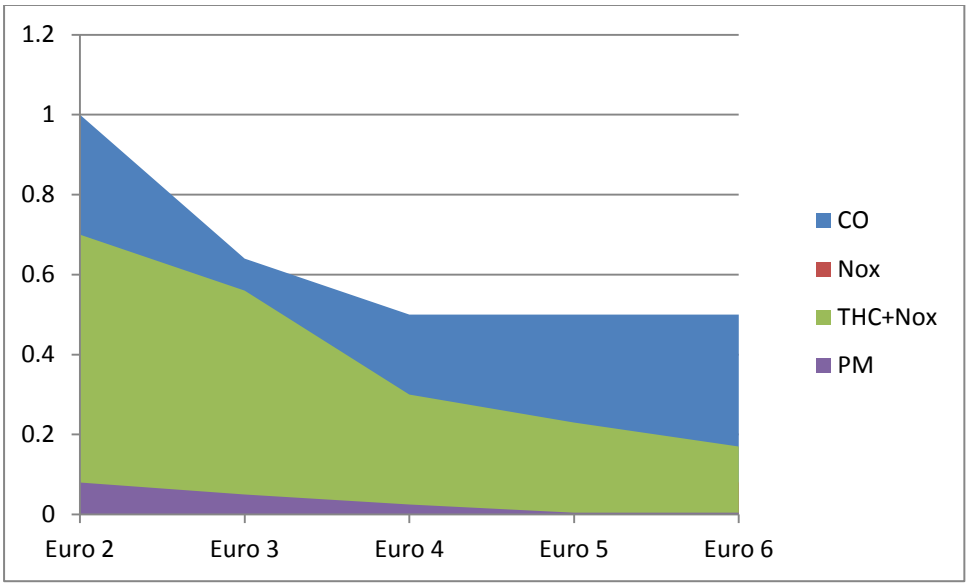


**Figure 6.2 – Light duty Diesel Engine Emission Standards**

The FCAI considers that providing the levels of the pollutants measured in the ADR 79/.. tests; HC, CO, NOx and PM, would not provide sufficient information by themselves to be useful in a consumer guide.

Also, as noted in Section 5.3 above, unless the necessary fuel quality is available in readily available market fuels, the expected levels of emission reductions from the introduction of the increasingly stringent emission standards may not be delivered in service.

## 6.4 FUNCTIONALITY AND UTILITY OF THE GVG WEBSITE

Currently the GVG provides information on some safety features available on the vehicle models listed on the GVG.

*Discussion Paper Questions:*

6. *Do you agree that the safety information should be removed from the GVG and a link provided to the ANCAP website?*
7. *Is there any additional objective environmental information that could be provided at an individual vehicle level on the GVG?*

The FCAI supports the proposal to remove the safety information that is currently on the GVG as;

- Information on safety features are available from other sources including vehicle brands own websites.
- While the safety features currently listed, i.e. airbags, ESC, seat belt reminders, are very important in providing safety to vehicle owners, vehicle brands are introducing more advanced safety features that are not currently listed.

The FCAI has no objection to including a link from the GVG to the ANCAP website provided the link is on a 'page' such as the existing information page on 'Safety Features' and the GVG does not attempt to link each vehicle model to its ANCAP results page.

The FCAI is not aware of any objective environmental information that could be provided at an individual vehicle model level.

The continued provision of ADR 83/00 Stationary Noise results also needs to be re-considered. Many new light vehicles are rev limited at no load to protect the engine, so stationary noise figures are not a good indication of real world noise, and it is questionable on the value provided to consumers.

The FCAI understands that the initial purpose for providing ADR 83/00 Stationary Noise results were to assist enforcement action by State/Territory Governments. Consequently while the GVG is a consumer guide, the FCAI recognises that State/Territory Governments require ADR 83/00 results for enforcement, and will want to continue to have this information available via the GVG, as there is no other source at this time.

## 6.5 COMPARING TOP SELLING AND PERFORMING VEHICLES

DoIT propose that the GVG will continue to provide fact sheets for the top selling and the top performing (i.e. lowest $CO_2$ emission) vehicles.

*Discussion Paper Questions:*

8. *Do you agree with the proposed approach for top selling vehicles? If not, why not, and what would you suggest?*
9. *Do you agree with the proposed approach for determining top performing vehicles? If not, why not, and what would you suggest?*
10. *Would you find the proposed top performing Euro 5/6 vehicles factsheet useful? If so, do you agree with the proposed approach to ranking these vehicles within categories?*

The FCAI have no objection to the proposed approach for providing fact sheets for top selling and top performing vehicles.

The FCAI does not support the proposal to provide fact sheets for the top performing *Euro 5* and *Euro 6* petrol and *Euro 5* and *Euro 6* diesel vehicles. As noted above, the emission standards are very complex and the results obtained from the certification testing is intended to demonstrate that the vehicle will continue to comply with the standards for a prescribed operating life.

## 6.6 GENERAL INFORMATION ON THE GVG

The Discussion Paper outlines that the DoIT propose to expand the general information pages to provide further background information and analysis on vehicle emissions.

*Discussion Paper Questions:*

11. *What background information and analysis do you consider useful to assist the consumer to understand better the objective data proposed to form the basis for comparisons of environmental performance of vehicles?*
12. *What websites would you recommend for the GVG to include a link to?*
13. *What relevant information do these websites provide?*

There are a large number of websites that provide information on vehicle $CO_2$ and exhaust emissions. The FCAI recommends that DoIT conduct its own investigation to determine if the information provided by various websites has relevant and accurate information.

The FCAI would recommend that the GVG, in either its existing information or via a link, highlight;

- The historical improvement in $CO_2$ performance of new vehicles such as the NTC's Information Paper, *Car Dioxide Emissions from New Australian Vehicles 2011*.
- The whole of government approach to $CO_2$ reduction

- The contribution of passenger vehicles to Australia's $CO_2$ emissions and consequently the contribution of new vehicles to Australia's $CO_2$ emissions.

## 6.7 DESIGN AND FUNCTIONALITY OF THE GVG WEBSITE

The DoIT have requested feedback on ways to make the GVG easier to navigate and to also give the website a more contemporary design.

*Discussion Paper Questions:*

14. *What changes would you suggest to make the GVG website easier for consumers to navigate?*
15. *What features would you suggest to make the design of the GVG website more contemporary?*

The FCAI is not in a position to provide feedback on these questions.

However, the FCAI considers that the GVG functionality could be improved in the method of collecting data. Currently, industry is required to enter the data manually into the GVG in addition to providing the same data to the government for vehicle certification. A significant improvement in functionality would be for the GVG to take the data from the ADR 81/02 certification submission and automatically populate the GVG saving time and reducing the administration burden to both industry and the Government.

## 7.0 CONCLUSION

The FCAI welcomes the opportunity to provide a response to the Government's proposal to change the GVG.

The FCAI supports a review of the GVG and in particular the proposals to;

- Remove the overall star rating.
- Make the $CO_2$ emissions as measured in the ADR 81/02 certification test as the central element of the GVG.
- Remove the air pollution rating.
- Remove the safety information.

The FCAI does not object to the following proposals;

- Including of estimated fuel production $CO_2$ emissions, based on National Greenhouse Accounts provided that the GVG does not include a total estimated 'well-to-wheels' figure.
- Include a link to the ANCAP website.
- Include other information on vehicle environmental impacts provided these are objective sources.

NOTE: Individual FCAI members may provide separate submissions expressing a different view to the FCAI position expressed above.

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