

3 November, 2022

New South Wales Environment Protection Agency

via: climatechange.review@epa.nsw.gov.au

Submission to the NSW EPA Consultation of its draft Climate Change Policy

The Electric Vehicle Council welcomes the opportunity to provide feedback on the New South Wales Environment Protection Agency's (EPA's) draft Climate Change Policy and draft Climate Change Action Plan.

We strongly support efforts by the New South Wales Government to deliver policy measures that will reduce emissions across the economy, including from the transport sector, in line with its emission reduction targets.

While New South Wales is already a leading government in Australia with regards to supportive electric vehicle (EV) policy, we would welcome further collaboration between the NSW EPA and other relevant NSW Government agencies to further accelerate EV uptake, and the deployment of associated charging infrastructure, in line with achieving the State's emission reduction targets.

While we recognise the NSW EPA's regulatory remit is largely limited within the transport sector, we welcome consideration of measures for supporting a reduction in emissions from non-road transport applications, including mining, construction and agricultural machinery, equipment, and vehicles. Support for the electrification of these applications will be critical to accelerating adoption of zero emission technology solutions and should be considered as part of this policy.

We also commend the NSW EPA on its plan to develop sector-specific emission reduction targets, including the transport sector. The Electric Vehicle Council would encourage development of a transport target - in collaboration with other NSW Government departments and industry - that provides a clear signal to the market as to the level of ambition required for reducing emissions from this important sector of the economy.

Unfortunately, it will be challenging for transport emissions to fall below 2005-levels by 2030 given the lack of national policy action to reduce emissions from this sector over the past decade. As a result, other sectors of the economy will have to reduce emissions even further to achieve a 43% reduction in emissions across Australia, and a 50% reduction in NSW by 2030.

It is critical that transport emissions are reduced as far as possible by 2030. Given transport emissions nationally increased by 22% between 2005 and 2019, a target of a 0% reduction in transport emissions by 2030 (compared to 2005-levels) will be ambitious but is likely still achievable. Post-2030 it is critical that a series of interim targets are developed that demonstrate a pathway towards net zero transport emissions by 2050 – at the latest.

In addition to existing supportive EV policy measures (incentives, targets, charging infrastructure), the NSW Government should also consider what other regulatory measures could support the electrification of transport (road and non-road vehicles, machinery), including future emissions limits on vehicles and machinery used in certain applications, particularly those that are close to urban populations.

Finally, efforts to accelerate the decarbonisation of electricity generation will also assist to reduce total emissions as road and non-road transport vehicles and equipment are electrified.

If you have any questions on this submission, please do not hesitate to contact Natalie Thompson at: natalie@evc.org.au

Yours sincerely,

Jake Whitehead

Head of Policy,

Electric Vehicle Council