

8 October 2024

NVES Strategy, Policy & Coordination Section  
Reducing Surface Transport Emissions Branch  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts

To whom it may concern

Thank you for the opportunity to make this submission to the *Proposed New Vehicle Efficiency Standard (Exempt Vehicles) Determination 2024*.

The Motor Trades Association of Australia (MTAA) has been an active participant in the development of the New Vehicle Efficiency Standard (NVES) and welcomes the opportunity to contribute to this aspect of the program's implementation.

As the national automotive industry body, the MTAA represents the unified voice of Australia's automotive industry, identifying and monitoring issues across all sectors, advising governments on industry impacts and trends, and actively participating in the development of sound public policy. Our focus encompasses the retail motor trades, the Australian vehicle fleet, and the mobility of local communities.

Given our interests we are particularly aware of the potential impacts on dealers and other automotive retailers of the impending NVES and believe exemptions are an essential part of a fair and balanced scheme, particularly to minimise adverse impacts on rural and regional stakeholders.

As outlined in our submission to *the Cleaner, Cheaper to Run Cars: An Australian New Vehicle Efficiency Standard Consultation Impact Analysis* in March 2024, MTAA believes that carve outs for certain categories of vehicles are vital for an equitable NVES. We recommend the following exemption categories be implemented:

- Low volume suppliers of less than 2,000 units per annum
- Rural and regional dealerships for a period of time (12-24 months) to allow for reduced disruption to key industries such as agriculture, tourism, manufacturing and mining
- Specialised use vehicles providing services to the Australian public including vehicles with special purposes, such as those used by the military, law enforcement, health and emergency services
- Vehicles used for the purposes of primary production

Secondly, we acknowledge the issue of vehicles in the NB1 category (3.5 to 4.5 tonnes GVM) for which a CO2 emissions test is not currently required under the ADRs. We support the Government's timely amendment of ADR 81/02 to ensure these vehicles are captured and counted towards the NVES as soon as possible.

Should you have any questions regarding this submission or any other matters, please do not hesitate to get in touch with myself on 0419 608 845 or [matt.hobbs@mtaa.com.au](mailto:matt.hobbs@mtaa.com.au).

Yours sincerely

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