Monday 22 July 2019

Attn: Department of Environment, Land, Water and Planning
The Hon, Lily D’Ambrosio
Minister for Energy, Environment and Climate Change
Minister for Solar Homes
Email: Climate.Change@delwp.vic.gov.au

Dear Minister D’Ambrosio,

Please find enclosed RACV’s submission to the Department of Environment, Land, Water and Planning regarding requests for input to the Interim Emissions Reduction Targets and potential priority actions as identified in Final Report (2021-2030).

With 2.2 million members, RACV is an advocate for Victorians – on the road, as they travel and in their home.

RACV supports a strategy that will reduce Victoria’s greenhouse gas emissions and importantly, that identifies and develops an achievable plan of action to meet determined emission reduction targets.

As an organisation, RACV has committed to reducing its carbon footprint by investing in a major energy efficiency and renewable energy initiative and has advocated to its members on the merits of renewable and alternative energy sources.

Real and sustained impact will only be achieved by ensuring that any priority action plan developed and implemented by the Victorian Government is economically sound, focuses across sectors, with prioritisation of long-term actions that can deliver the greatest impact in emission reduction.

Yours sincerely,

BRYCE PROSSER
GENERAL MANAGER, CORPORATE AFFAIRS & COMMUNICATIONS
Overview

Below are RACV’s comments in relation to priority actions it believes should be considered by the Government when determining potential opportunities to reduce emissions in the most efficient and cost-effective manner. These should be considered as a whole and not read in isolation.

Electricity Supply

RACV supports action that shifts the emphasis of electricity generation from coal and gas to renewables.

Comments:
- RACV has been an advocate of renewable energy and encourages all Victorians to seek alternative energy resources where it is feasible and economically viable.

Transport

Electric Vehicles

RACV supports the development of electric vehicles and supports improving motor vehicle efficiency and a shift to electric and other low/zero emissions vehicles.

Comments:
- RACV’s annual survey on electric vehicles, which drew 1300 responses from RACV members, demonstrates that consumers are supportive of electric vehicles.
- The major hurdle stopping respondents from purchasing an electric vehicle was how far they could travel without charging their batteries, which was a factor for almost three out of every four people.
- RACV members want an electric vehicle they can drive 450 kilometres without recharging and when they do need to recharge, it should take under half an hour, at a cost of less than $20. 73 per cent of survey respondents want the government to provide more public charging facilities.
- 71 per cent of survey respondents believe governments should be providing incentives to reduce the cost of buying electric vehicles, and 67 per cent want incentives to install charging facilities in private homes.
- 57 per cent of respondents would expect to source their electricity from solar panels or battery storage, or from a green power contract if they owned an electric vehicle. This highlights the connection between home energy and the move towards electric vehicles.

Mode shift and behavioural change

RACV welcomes actions which achieve a shift from the private motor vehicle, towards more sustainable modes of transport and behavioural change (e.g. car sharing; telecommuting, intelligent freight systems etc)

Comments:
- People need choices that enable them to change their behaviour or shift to more sustainable transport modes. This requires significant investment in those choices.
especially high capacity, high frequency public transport. Planning for a state with a vast, connected and efficient public transport network must be a priority to achieve any significant mode shift.

- Other modes of transport such as cycling, walking and car sharing (including car share fleets) also play an important role. This requires a significant change in attitudes towards any perceived loss of road space (including parking spaces), greater investment in infrastructure and possible incentives to achieve any notable mode shift.

- Travel demand management, specifically transport network pricing, has the potential to achieve a much more efficient transport system. Mobility as a Service (i.e. RACV’s arevo app) and Intelligent Transport Systems can play major roles in helping manage demand and nudging people to reduce their transport emissions. This would provide greater incentives for people to use sustainable modes of transport, however users also need to have access to suitable alternative modes (i.e. public transport), to minimise any equity issues.

- Transport planning and land use planning must work in unison; a genuinely integrated approach can create sustainable places and embed more efficient transport behaviour.

- RACV supports measures to improve the efficiency of freight movements, by placing freight on rail wherever possible, reducing the number of trucks that need to be on our roads.

**Built Environment**
RACV was a major contributor to the Building Code Energy Performance Trajectory project. As part of its involvement, it aimed to communicate the importance of building sustainable homes for the long-term future of Victoria.

**Comments:**

- RACV wants Victorian homes to be built for the future. Research shows improving efficiency through building standards is a concrete way to cut energy costs and reduce household generated emissions.

- Low energy homes reduce stress on the electricity grid. For every household that cuts their peak demand by 1kW would save almost $1000 in electricity system infrastructure.

- RACV believes the Victorian Government should be advocating for changes to the outdated National Construction Code as the energy efficiency standards within the Code have not been updated since 2010.

- Stronger energy standards in the National Construction Code could reduce household energy bills by up to $900 each year, contributing to up to $29 billion in reduced energy bills and 78 million tonnes of cumulative emissions savings across the economy by 2050.
The next opportunity to strengthen the residential energy standards in the Code will be in 2022. A delay could mean an extra $1.1 billion in unnecessary household energy bills between now and 2050.

**Final statement**

A number of the points raised by the RACV are not new and we encourage the Government to consider the environmental and economic benefits of these.

RACV supports policies which provide greater priority for sustainable models of transport, encourage uptake of lower emission and electric vehicles and contribute to lowering emissions generated by the built environment.

The Government should prioritise those actions which will have the greatest impact in reducing emissions, that can be delivered in the required timeframe and that are developed from a sound economic basis, noting collaboration with the Federal Government is imperative.