



Submission regarding

**Environment Protection (Vehicle
Emissions) Regulations**

Conducted by
Environment Protection Authority

23 September 2013

RACV has reviewed the proposed regulations and takes the following view on the issues likely to affect our members.

Are the objectives of the proposed Regulations valid? Is there sufficient concern about air quality and noise and associated health impacts to warrant ongoing Regulation?

RACV supports regulatory mechanisms to control and reduce vehicle emissions, but our position is that this should be done concurrently with government policies that encourage the uptake of green vehicles (and fuels) and fuel efficient driving. The objectives of the proposed regulation are considered to be valid as there is still a need for a mechanism to remove grossly polluting vehicles from the road. The adoption of national regulations, where applicable, also helps to reduce confusion of both motorists and enforcement agencies across different jurisdictions. RACV believes that increased efforts should be made to inform the public on the ramification of the regulations.

Mandatory maintenance programs

RACV does not support new regulations that will create additional costs for motorists who drive vehicles that are operating correctly and do not contribute heavily to pollution. We note that the introduction of a mandatory maintenance scheme is 'not preferred'. We support this classification as we believe that, although a maintenance scheme may remove the majority of grossly polluting vehicles from the road, the time and cost of complying with such a scheme would also significantly impact motorists.

Vapour Recovery

The introduction of mandatory Vapour Recovery systems at petrol stations is seen as an effective method in further reducing the vapour emissions generated when refuelling a car. However RACV support the EPA's position not to mandate vapour recovery as the installation costs will be passed onto motorists through increased petrol prices. The increasing price of petrol is of great concern to our members. Market research conducted in 2012 indicates that 88% of motorists regard the price of fuel as their main concern in terms of the cost of owning and operating their car. The costs associated with the introduction of vapour recovery systems would severely impact the public, who are already faced with increased cost of living pressure.