



OFFICE OF THE COMMISSIONER
FOR SUSTAINABILITY AND
THE ENVIRONMENT

Standing Committee on Planning,
Transport and City Services
Email: LACommitteePTCS@parliament.act.gov.au

To whom it may concern

Inquiry into Electric Vehicle Adoption in the ACT

The Commissioner for Sustainability and the Environment is an independent statutory position established by the *Commissioner for Sustainability and the Environment Act 1993*. My Office embraces transformative change for an environmentally sustainable future and encourages sound environmental practices and procedures to be adopted by the Territory.

The Office supports the proposed transition to electric vehicles (EVs) and would like to commend the targets that have been set. The *ACT's Zero Emissions Vehicles Strategy 2022-2030* notes that since our transition to 100% renewable energy supply in 2020, transport is now the leading source of greenhouse gas emissions produced within the ACT. As such, transitioning to EVs will constitute an important step towards achieving the target of net zero emissions by 2045.

Addressing Scope 3 transport emissions

While transport is a worthwhile focus for greenhouse gas emissions reduction, transport within ACT borders is a very minor contributor in the context of our broader carbon footprint. This is because 93.6% of the Territory's total emissions are generated outside the ACT in the form of goods that are then transported in for residents' consumption and use. The highest product group contributing to this figure is transport, postal and warehousing (14.7%). This is discussed in detail in our 2021 report on *Scope 3 Greenhouse Gas Emissions*¹ and will be a focus point of the present submission.

The eventual adoption of EVs through the national (and international) supply chain is crucial if the ACT is to truly lower its carbon footprint and reduce its transport-related emissions. Thus, while transitioning to EVs within the ACT is a commendable first step, the ACT Government should also work to support and promote the introduction of similar initiatives on a federal level. A nation-wide transition to EVs will have a significant impact on the ACT's emissions, lowering the carbon footprint of everything we use and consume within the Territory from food and textiles to construction materials and infrastructure.

¹ Office of the Commissioner for Sustainability and the Environment, 2021. *Scope 3 Greenhouse Gas Emissions in the ACT*. <https://envcomm.act.gov.au/wp-content/uploads/2021/11/Scope-3-Greenhouse-Gas-Emissions-in-the-ACT-FINAL-Report-A30648089.pdf>

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The transition to EVs will require the manufacture and sale of new vehicles on a large scale. Every item we purchase has an embedded carbon cost, which is much higher for new items than those we buy second-hand. With the second-hand EV market highly limited at present, it is important to consider how the transition to EVs can be achieved in a way that considers scope 3 emissions, such as by phasing out older cars first. This could include providing higher incentives to transition to EVs for owners of older model vehicles. Another action could be to support businesses that convert internal combustion engine vehicles (ICEVs) to EVs. At present, conversion is costly and not suited to all vehicle types.

Recommendation 1: ACT Government should strongly advocate for federal policies that encourage the uptake of EVs across Australia.

Recommendation 2: ACT Government should consider the ways in which scope 3 emissions can be minimised in the transition to EVs.

End-of-life battery disposal

Discussions around the sustainability of EVs need to incorporate whole of life considerations. Batteries are a key component of these vehicles – as such, how they are made, what materials they are made from, and whether they can be recycled significantly affects the sustainability of EVs as a whole. It is important that circular economy principles are built into batteries from the start if the potential of EVs as an environmentally sustainable product is to be maximised.

A large-scale transition to EVs will necessitate higher battery production. This has implications for natural resource exploitation, with higher demand for extracted materials like lithium which is highly water-intensive to mine. At end-of-life, improper battery disposal can also have significant environmental impacts. Lithium-ion batteries contain corrosive materials which can leach into surrounding soils and lead to the pollution of waterways.

Although EV batteries are typically recyclable, there are issues achieving this in practice. In part this is because their construction is not standardised – different manufacturers use a variety of assembly methods and material compositions, meaning batteries can vary widely depending on who made them. Many e-waste recyclers do not have the technology to deconstruct and effectively recycle these complex batteries, so they often end up in landfill.

Recommendation 3: ACT Government should ensure that legislation is in place to support and promote the environmentally sound recycling of EV batteries, whether this occurs within the ACT or in partnership with surrounding jurisdictions.

ACT Government's role in providing charging infrastructure

For EV adoption to be successful in the ACT, it is crucial that support for EVs is incorporated into all relevant future government policies and strategies. This includes insuring charging stations are adequately planned into the development of new residential areas, government buildings and public spaces.

Furthermore, the ACT is unlikely to achieve its EV adoption targets if it operates unilaterally. Working with surrounding jurisdictions is crucial to ensuring ACT residents feel confident purchasing EVs without concerns about charging availability for regional and interstate travel.

Recommendation 4: ACT Government should embed support for EVs into all future ACT Government development and infrastructure strategies.

Recommendation 5: ACT Government should work with other jurisdictions to establish consistent and reliable charging infrastructure along major routes to and from Canberra.

Thank you for your consideration and please do not hesitate to contact me if you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Lewis', with a long horizontal flourish extending to the right.

Dr Sophie Lewis
Commissioner for Sustainability
and the Environment

5 August 2022