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Submission to ACT Climate Change Strategy for 2026–35

Thank you for the opportunity to make this submission on the next ACT Climate Change Strategy.

About AEVA

The Australian Electric Vehicle Association (AEVA) is a volunteer-run, not-for-profit organisation dedicated to switching Australia's transport networks to electric drive as quickly as possible. Formed in 1973, AEVA primarily represents the consumers and end-users of electric vehicle (EV) technology, disseminating knowledge through our collective experience. AEVA has active branches in every state and territory. This submission is made by the ACT branch.

Introduction

Electrification of transport is a key measure in most countries attempting to reduce emissions. The ACT's 100% renewable electricity supply makes this strategy even more effective. An increased fleet of EVs will result in deep cuts to transport emissions along with a reduction in death and disease from traffic related air pollution, a lower total cost to owners and an improvement in resilience to liquid fuel supply disruptions.

In responding to the ACT Climate Change Strategy Discussion Paper, we have avoided providing detailed policy recommendations. Instead, we have presented the current position and highlight the scale of ambition that will be needed to reach net zero by 2045. We have also made some comments on aspects of the discussion paper to focus the policy response.

Ground transport emissions

As noted in the discussion paper, transport is the ACT's largest source of emissions (61%), and, of that, private light vehicles are the largest contributor. Transport emissions have remained stubbornly high mainly as a result of larger, more polluting vehicles and a growing ACT population (see Figure 1). In the past six years, the number of registered vehicles has grown by around 40,000 (13%) to 345,000 vehicles while the number of battery electric vehicles has grown by around 13,700. Battery EV uptake is not yet reducing the number of internal combustion engine (ICE) vehicles in the ACT vehicle fleet.

Without a rapid transition of the fleet to predominantly very low and zero emissions vehicles, the ACT cannot possibly achieve its net zero target, which is 19 years away. The average age of a car in the ACT is [around 10.7 years](#), but the distribution has a long tail with around 10% of vehicles being

18 years or older. The 19 years remaining until 2045 necessitates a rapid switch to electric vehicles and, even with the most successful policies, the ACT will still have a significant number of polluting ICE vehicles in the vehicle fleet in 2045. These older vehicles will likely be owned by the lowest income Canberrans. Urgent action is required if we are to meet the 2045 net zero target and to avoid creating stranded assets.

Many of the transport-related ideas covered in the discussion paper relate to urban planning that will help to reduce car dependence, however the unfortunate reality is that none of these measures are rapid enough to achieve the deep cuts in transport emissions required by 2045. AEVA strongly supports the Avoid-Shift-Improve framework. Measures that can be implemented quickly could include work from home policies (avoid), walk/ride to school programs (shift), construction of active travel infrastructure (shift), incentives for e-bikes (shift) and improvements to the public transport service (shift). As valuable as the above measures could be, we also emphasise that “improve” (substituting combustion vehicles with EVs) may be the most effective way to achieve a large share of the emissions abatement in the required timeframe.

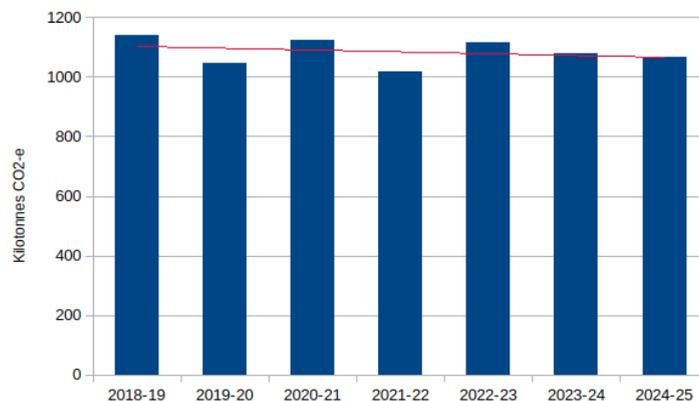


Figure 1: ACT transport greenhouse emissions (CO₂-e) from 2018-19 to 2024-25 (Data sourced from [ACT greenhouse gas inventory 2024-25](#); trend line in red)

It is often stated that the ACT’s nation-leading uptake of electric vehicles is around “one in four”. However, uptake has been stuck at this level (actually 18%) for over three years (see Figure 2). A dramatic increase in EV adoption is needed to achieve the targets of 80-90% EV sales by 2030 and no new ICE vehicle registrations from 2035.

The scale of the challenge to turn over the ACT vehicle fleet by 2045 cannot be understated. It is important to draw the distinction between the EV share of sales (averaging around 18% in the ACT) and the resultant EV share of the fleet (currently around 4% in the ACT). If the share of sales never rises above, say, 20%, then the fleet share will approach but never exceed 20% because eventually older EVs will leave the fleet. Thus, to reach a high fleet share of EVs, it is critical for the sales share to reach nearly 100% as quickly as possible. This has been achieved in Norway where the battery electric vehicle (BEV) share of sales is now around 97%. Despite this, the BEV share of the fleet is still only around 32% (see Figures 3 and 4). It took three years to increase the fleet share of BEVs from 10% to 20% in Norway, even when almost all newly registered vehicles were BEVs. Norway is now considering policy options to increase the rate of fleet turnover.

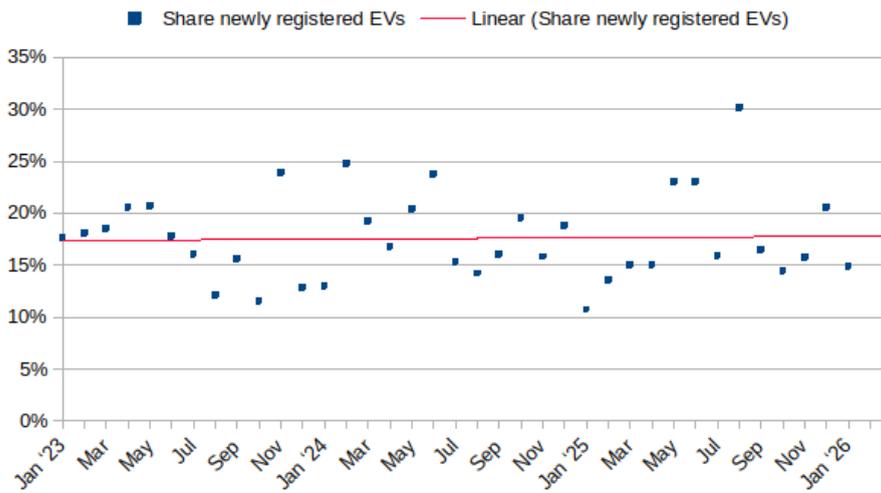


Figure 2: Monthly share of newly registered vehicles being BEVs
(Data sourced from ACT Government ZEV Dashboard)

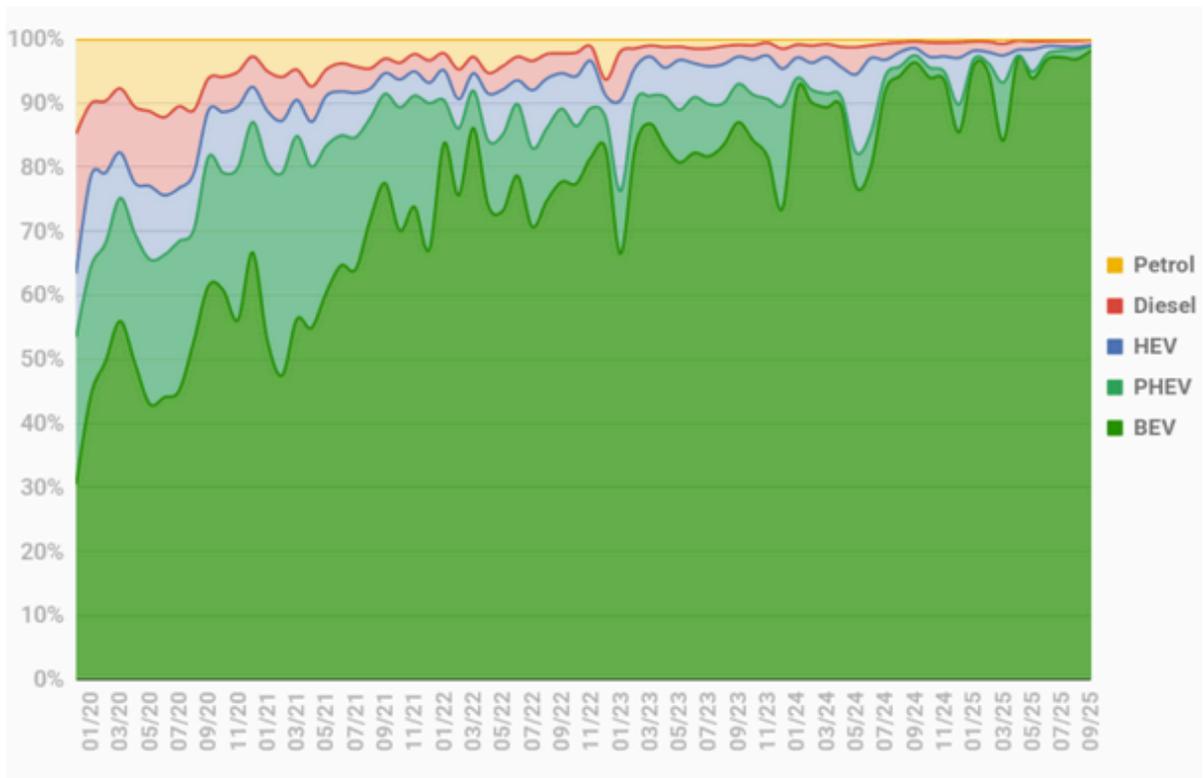


Figure 3: Norway monthly powertrain market share
(Credit: Dr. Maximilian Holland/Cleantechnica. Data from Opplysningsrådet for Veitrafikken)

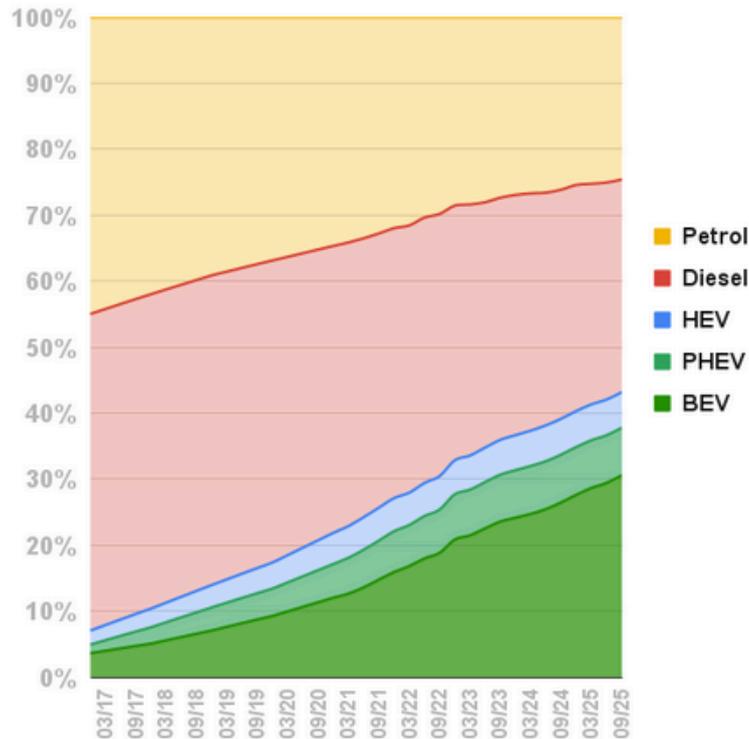


Figure 4: Norway fleet powertrain share

(Credit: Dr. Maximilian Holland/Cleantechnica. Data from Opplysningsrådet for Veitrafikken)

The long lifespan of vehicles means that waiting for ICE vehicles to be replaced by EVs is very unlikely to be sufficient to meet emissions targets, particularly interim targets. We recommend policies not just to promote new BEVs but also to encourage the replacement of high-emitting ICE vehicles with used BEVs and existing lower emissions ICE vehicles (e.g. conventional hybrids) whenever an ICE vehicle is sold. It is crucial that the ACT minimises the sale of new ICE vehicles (which will persist for up to 20 years) and utilises policies to substitute efficient fossil-fuelled vehicles that already exist in the fleet. The second-hand BEV market is growing rapidly in Australia and offers the potential for used EVs to be imported into the ACT.

The ACT is a small vehicle market surrounded by a much larger south-east Australian market and with close proximity to Sydney. With the right policy settings, used car dealers in the ACT would be given an incentive to stock an overall lower emissions mix of vehicles in their yards, while exporting the worst emitters for sale interstate or to scrap. We note our [2026-27 ACT Budget submission](#) which recommends that the ACT Government reform stamp duty to send a strong price signal through a wider spread of progressively higher stamp duty rates on both new and used vehicles in higher emissions bands.

The discussion paper raises two activity areas for the transportation sector (grid integration and EV charging) which AEVA would like to respond to in the following paragraphs.

Grid integration of EVs

The discussion paper raises the further exploration of how EVs can support the grid. It is the view of AEVA that vehicle-to-grid (V2G) is likely to be a useful technology, but is unlikely to be as important as believed by its industry promoters. Home battery systems with capacities approaching those of EV batteries are being rapidly installed as a result of the Cheaper Home Batteries Program. We believe that by the time V2G bi-directional inverters are available at a reasonable cost, stationary home batteries will be the more convenient and economical choice. The focus should be on smart EV charging to provide a source of flexible load. Exploring the grid integration of EVs should not distract from the crucial activity of reducing emissions from the transport sector.

EV charging

The discussion paper also raises public charging as a barrier to EV adoption. Additional public charging is welcome and helpful for certain classes of BEV drivers such as commercial operators, ride-share drivers, visitors to the ACT, and those finding it difficult to have charging facilities added to their strata buildings. Retrofitting charging in strata developments is a complicated topic because there is no single best solution that is appropriate for all buildings. Please also consider our [detailed submission](#) to the ACT Legislative Assembly inquiry into the management of strata complexes. Most Canberrans, however, have off-street parking and can generally organise home charging fairly easily. It would be a mistake to over-emphasise public charging as an impediment to the uptake of BEVs.

Useful contributions in the area of charging include provision of charging at park-and-ride locations. Trickle charging during the day at such locations can encourage the use of public transport, may be all the charging a driver needs once a week, and can usefully absorb solar electricity production.

Aviation emissions

The aviation sector presents a challenge to the ACT Government as most aspects of aviation are controlled by the Federal Government. A mandate, for example, to use sustainable aviation fuel (SAF) at Canberra Airport could be overridden. The Federal Government's proposed high speed rail service from Brisbane to Melbourne will provide a very attractive alternative for Sydney and Melbourne journeys, but neither route is likely to be operational by 2045. It is therefore necessary to consider what the ACT Government can do within its legislative powers to reduce aviation emissions using options that are available today.

Due to the way that aviation emissions are accounted for in the ACT greenhouse gas inventory, all flights have relatively comparable emissions regardless of their destination (or origin) because the methodology only considers fuel consumed in the taxiing, take off, and climb out phases of the flight (and, conversely, descending and landing into Canberra). Approximately 40% of all Canberra flights have Sydney as their origin or destination. The [2024-25 ACT greenhouse gas inventory](#) notes a welcome reduction in aviation emissions due to a change from Boeing 717 aircraft to more efficient Airbus A220 aircraft, however there are limits to how much aviation emissions can be reduced through efficiency alone.

The Avoid-Shift-Improve framework can be also applied to air travel. Measures could include:

Avoid – Replacing business travel with videoconferencing

Shift – Shifting to coach or rail travel, especially for short sectors

Improve – Using more fuel-efficient aircraft, deploying [electric tow vehicles](#) to tow aircraft to and from the runway (eliminating fuel burn for taxiing), and blending SAF with jet fuel

The large share of flights to and from Sydney presents a significant opportunity to reduce aviation emissions by replacing these short-haul flights with an attractive train service to Sydney Airport and Central Station. Canberra has an intercity rail service to Sydney which is slow, but well patronised by travellers who are not in a hurry. The hourly bus services to Sydney are faster than the train and are also well patronised, often by air travellers connecting to Sydney International Airport. The New South Wales Government is unlikely to improve the track alignment to Sydney when Canberrans would be the main beneficiary of a better service. The ACT Government should consider a greater contribution of perhaps 50% to a joint project with NSW or seek Commonwealth funding. AEVA member David Glynne Jones has produced a [proposal for repowering](#) old rolling stock into a battery electric train capable of servicing the Canberra to Sydney route in around three hours.

The tourism policies of the ACT Government are also exacerbating aviation emissions by subsidising direct international flights through the Aviation Stimulus Fund. If Canberrans were to connect to international flights in Sydney, travelling there by bus, train or better suited regional aircraft, ACT emissions would be reduced compared with flying widebody jets into Canberra.

Summary

Transport is the largest source of emissions in the ACT and, of that, private light vehicles are the largest contributor. Transport emissions have remained stubbornly high mainly as a result of the trend towards larger, more polluting vehicles and a growing ACT population. Tackling this large wedge of emissions in a timely way is crucial to meeting the Government's current emissions targets. This will require leadership, ambitious policies, and the support of the ACT community. We hope that our submission has helped to illustrate the scale of this challenge. AEVA stands ready to assist in promoting electric transport and educating the Canberra community about its benefits.