

## Submission to the National Electric Vehicle Strategy consultation paper

Department of Climate Change, Energy, the Environment and Water  
By email - NEVS@industry.gov.au

Monday, 31 October 2022

Minister Bowen,  
Minister King,

On behalf of our WeRide members and undersigned bicycle organisations from across Australia, we welcome the opportunity to provide a submission to the development of the Commonwealth's *National Electric Vehicle Strategy*.

We strongly support the statement by Ministers Bowen and King in the foreword that the:

*"time has come for Australian households and businesses to reap the benefits of cheaper, low emissions transport that is fit for the 21st century."<sup>1</sup>*

This submission outlines how a transition to electrification of the transport system that includes e-bikes and micro-mobility would further the Government's emissions reduction objectives and assist in meeting Australia's emissions reduction target of 43% on 2005 levels by 2030 and net zero emissions by 2050.

The Department of Climate Change, Energy, the Environment and Water's overview for the Discussion Paper notes that feedback will:

*"...help shape a truly national Strategy to ensure Australians can access the best transport technologies and help meet our emission reduction targets,"*

And making sure

*"we capture opportunities and have an orderly transition to transport electrification."<sup>2</sup>*

E-bikes fall under the globally accepted banner of 'light electric vehicles' (LEV)<sup>3</sup>. We strongly submit that a national electric vehicle strategy should include LEVs, including e-bikes and other micro-mobility devices. Recognising the importance of this rapidly changing sector of transport is critical to the Government's ambitious plans to speed the transition across all road segments.

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<sup>1</sup> Foreword 'National Electric Vehicle Strategy: consultation paper,' accessed on 23/10/22 at <https://consult.industry.gov.au/national-electric-vehicle-strategy>

<sup>2</sup> Ibid.

<sup>3</sup>Hyvönen et al. (2016), 'Light Electric Vehicles: Substitution and Future Uses'.  
<https://doi.org/10.1016/j.trpro.2016.12.085>

Indeed, as the Discussion Paper states:

*“This includes measures relating to micro-mobility, motorbikes, light and heavy vehicles.”<sup>4</sup>*

### **More than 10 million Australians ride a bike**

Australian bicycle organisations represent the 10.19 million Australians (40%) who ride a bicycle in an average year<sup>5</sup>, a participation rate borne out by a new bicycle sales record<sup>6</sup> of 1.7 million units in the year to 30 June 2021<sup>7</sup>.

Critically, we argue that increasing e-bike use is a significant opportunity as they provide a mobility option for the many Australians who would not otherwise consider riding a bike. The annual sales of e-bikes confirm this opportunity growing over 800% to 75,000 in the five years to 2021-22.<sup>8</sup> It should be noted this growth has been reduced due to availability of stock around the world. Global experience leads us to believe that this growth will continue.

Such is the potential for rapid and affordable transformation of our transport system with e-bikes, that the University of Oxford’s Christian Brand has stated<sup>9</sup> that *‘cycling is ten times more important than electric cars for reaching net-zero cities’*.

We strongly support the Government’s goals to make all EVs more affordable and expand uptake, leading to lower emissions and costs for Australians.

### **A multi-modal approach**

We also call for the Strategy to recognise the potential for increased e-bikes and other light electric vehicles to contribute to the goals and objectives and we call for their inclusion in the National EV Strategy.

A multi-modal approach that leverages the accessibility, cost-effectiveness and ultra-low or zero emissions of light electric vehicles will result in the best outcomes – whether EV, e-bike, or other micro-mobility such as e-cargo bikes for first and last mile freight deliveries.

E-bikes and micro-mobility are increasingly popular as car-replacements for daily commuting trips, they address the cost-of-living crisis through significantly lower acquisition and running costs than EVs, they are viable for the short transport trips that make up half of all trips each day in Australia and their use contributes to health, environmental and community benefits.

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<sup>4</sup> Page 4, *ibid*.

<sup>5</sup> <https://www.cwanz.com.au/national-walking-and-cycling-participation-survey-2021/> accessed on 28/10/22

<sup>6</sup> <https://www.bikeoz.org/news/a-new-record-in-bike-numbers1>, accessed on 28/10/22

<sup>7</sup> This record is due in part to the COVID sales boom and surpasses the previous record from 2014-15 of 1.42 million units imported into the country.)

<sup>8</sup> Bicycle Industries Australia figures.

<sup>9</sup> <https://theconversation.com/cycling-is-ten-times-more-important-than-electric-cars-for-reaching-net-zero-cities-157163>, accessed on 28/10/22

**The Australian bicycle sector**

The Australian bicycle organisations signing this submission are pleased to present responses and information in response to the Discussion Paper to assist the Government shape an equitable national strategy that ensures Australians can access the best transport technologies, whatever the number of wheels, and that speeds up the transition for a low carbon future.

We thank you for the opportunity to provide input to the National Electric Vehicle Strategy in this submission.

Kind regards,

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This submission is tendered on behalf of the following Australian bicycle organisations



## Submission to the National Electric Vehicle Strategy

### Strategic context

#### Key commitment by the Australian Government:

*“Our Powering Australia Plan<sup>10</sup> sets out how we will meet our climate targets. It includes our commitment to develop Australia’s first national electric vehicle strategy.”*

*“The Strategy will also include measures to speed transition across all road transport segments. This includes measures relating to micro-mobility, motorbikes, light and heavy vehicles.”*

#### Support and context for National EV Strategy

The predominance of road transport as a source of Australia’s emissions is a cause for concern and the signatories to this submission strongly support the Government’s efforts to transition transport through electrification of the fleet and the development of a National Electric Vehicle Strategy (‘the Strategy’).

The scale of growth in the passenger task due to population growth is well understood and presents significant challenges for the transition of the fleet to low or zero carbon modes.

What is perhaps less well understood and discussed is the scale of the opportunity that exists to convert some of the very large number of short trips undertaken in Australia each day to LEVs such as e-bikes.

In 2016, 9.2 million Australians travelled an average of 16.5 kilometres to work on Census day.<sup>11</sup> On any given day in Australia, there are around 76 million trips for all purposes, most of which are not trips to work.<sup>12</sup>

in the Melbourne metro region, the 2018 VISTA Survey showed that of 13.6 million trips every weekday, 25% were for work, 21% were for social or recreational purposes, 15% for shopping and a combination of drop off or pick up and education trips equalled around 31%.

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<sup>10</sup> <https://www.alp.org.au/policies/powering-australia>

<sup>11</sup> Cooper J & Corcoran J, *Journey to Work in Australia*, University of Queensland, accessed on 8/11/2019 at [www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0.55.001~2016~Main%20Features~Feature%20Article:%20Journey%20to%20Work%20in%20Australia~40](http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0.55.001~2016~Main%20Features~Feature%20Article:%20Journey%20to%20Work%20in%20Australia~40).

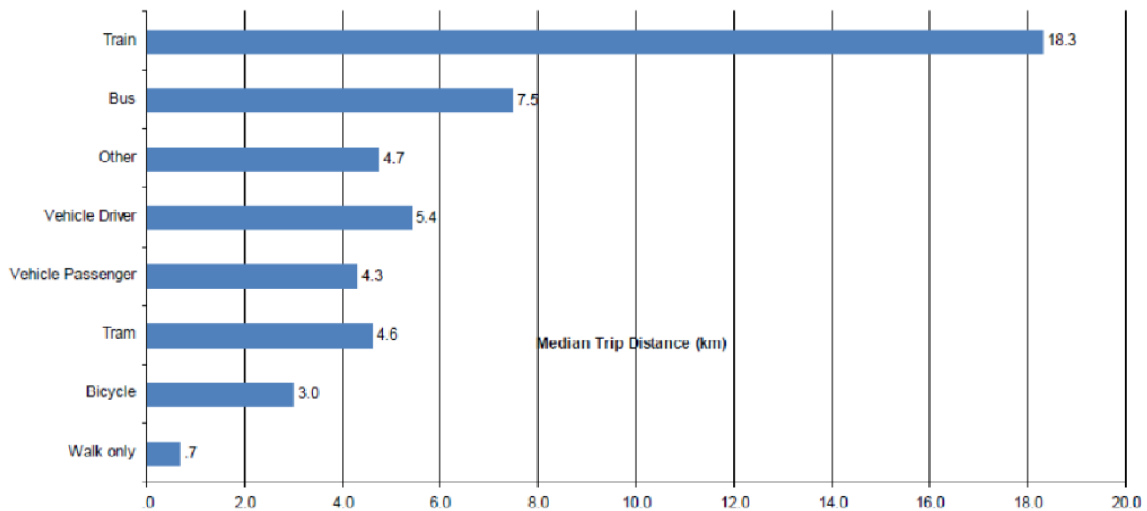
<sup>12</sup> Calculated from *BITRE Australian Yearbook Statistics 2017 – Transport*, accessed at [www.bitre.gov.au/publications/2017/yearbook\\_2017.aspx](http://www.bitre.gov.au/publications/2017/yearbook_2017.aspx)

Population growth indicates that transport-related congestion and pressure on the existing transport network will grow significantly in coming decades with ‘our population projected to grow by 24% to reach 31.4 million by 2034.’<sup>13</sup>

Based on passenger kilometres travelled, public transport usage is projected to grow by 32 per cent across all capital cities between 2011 and 2030.<sup>14</sup>

**Short trips each day**

Average distances travelled are not great and a large number of short trips are made in Australia every day. In Melbourne, the 2018 VISTA Survey shows the average trip by car is less than five kilometres, indicating there could be several other modes suitable to complete those trips if their use was supported and incentivised.



**Median Trip Length by Mode – Metropolitan Melbourne (Source: VISTA 2009)**

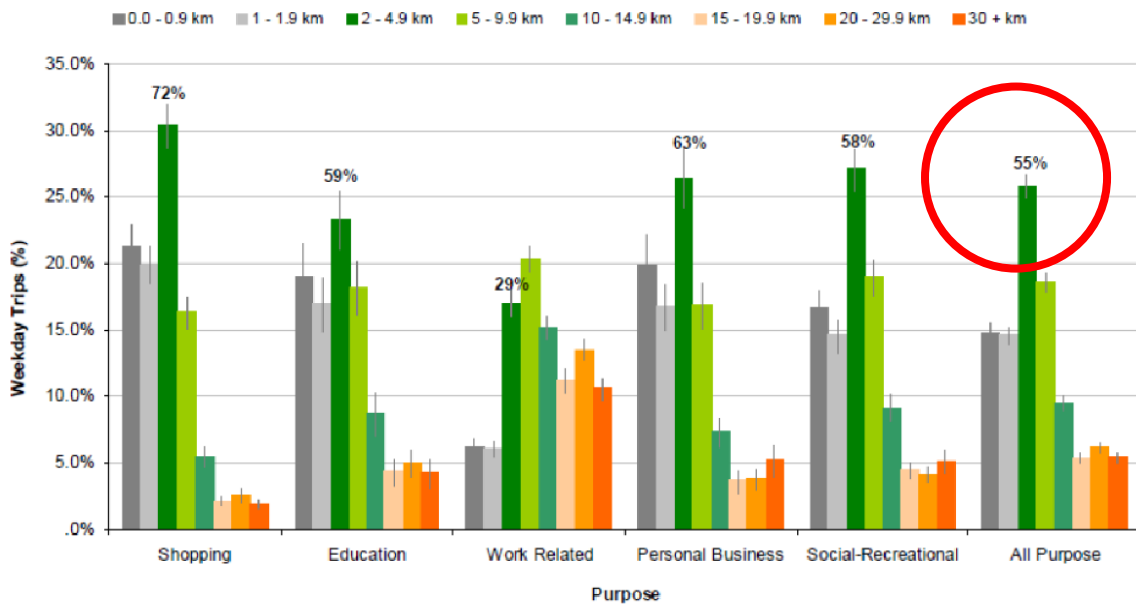
Above: slide from a presentation by Mr David Shelton, previously Executive Director, Strategy and Planning, VicRoads.

More than half of the trips made each day are less than five kilometres; in Melbourne they are an average of 4.3 kilometres.

<sup>13</sup> Infrastructure Australia, *Record infrastructure spend the new normal, 2019 Australian Infrastructure Audit warns*, media release 13 August 2019, accessed on 8/11/2019 at <[www.infrastructureaustralia.gov.au/sites/default/files/2019-08/media-release-audit\\_0.docx](http://www.infrastructureaustralia.gov.au/sites/default/files/2019-08/media-release-audit_0.docx)>

<sup>14</sup> Bureau of Infrastructure, Transport and Regional Economics, *Research Report 129 – Public transport use in Australia’s capital cities: Modelling and forecasting*, Australian Government, Canberra, 2013.

**Average weekday trips by purpose and distance**



**Average Weekday Trips by Purpose and Distance (Source: VISTA 2009) Note: figures above dark green columns reflect percentage of trips < 5 kilometres.**

Above: slide from a presentation by Mr David Shelton, previously Executive Director, Strategy and Planning, VicRoads.

The diversity of the transport task in Australia requires an equally diverse response in the Strategy to drive an increase in zero emissions travel by all modes and achieve an accelerated reduction of emissions to meet our target of 43% by 2030.

Significant increases in walking and cycling during the global pandemic have shown us just how fast behaviour change can occur. The increase in bike sales noted earlier also contributes to the bikes available to the entire population that can reduce lag time when measures are taken to boost use of e-bikes and increase the likelihood of people choosing to ride in future years<sup>15</sup>.

**A diverse transport system requires a multi-modal Strategy**

We submit that consideration of LEVs, that include e-bikes and other micro-mobility devices, should inform the development of the Strategy in order to address road transport’s contribution of 85% of the total of 19% of Australia’s emissions that are due to transport.

Not only will replacement of the internal combustion engine (ICE) car fleet take more than a decade to turn over<sup>16</sup> – even with rapid uptake of EVs – but the replacement by electric vehicles is also a carbon intensive process with one popular EV’s embedded carbon (Tesla 3 production and life-time operation) calculated in a study<sup>17</sup> at 56,400 kg CO2 and for comparison the CO2 embedded in the production of one e-bike (Trek MTB) was calculated at 229 kg CO2<sup>18</sup>. The strategy should include

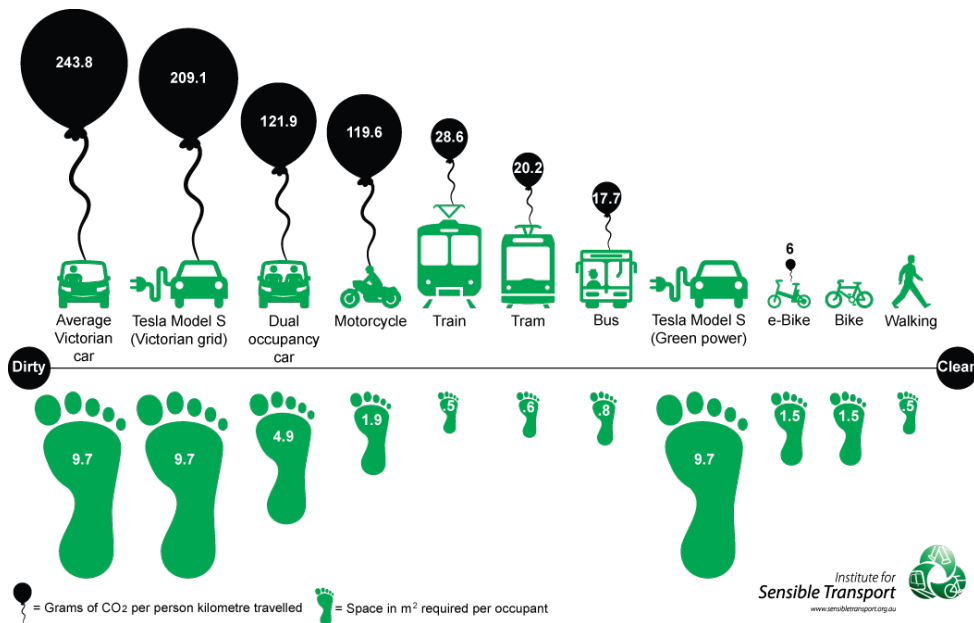
<sup>15</sup> <https://www.tandfonline.com/doi/full/10.1080/01441647.2021.1914900> accessed on 28/10/22

<sup>16</sup> <https://iopscience.iop.org/article/10.1088/1748-9326/aaf4d2>, accessed 25/10/22

<sup>17</sup> <https://doi.org/10.1051/e3sconf/201913601009>, accessed on 25/10/22.

<sup>18</sup> <https://view.publitas.com/trek-bicycle/trek-bicycle-2021-sustainability-report/>, accessed on 25/10/22

light electric vehicles in addition to EVs given the embodied and consumed carbon over a life cycle is significantly lower.



Above: graphic from the Institute for Sensible Transport<sup>19</sup>

The necessity for a wider system transformation in transport has also been recognised internationally in the COP26 ‘Declaration on accelerating the transition to 100% zero emission cars and trucks’ in July 2022 which stated:

*“We recognise that alongside the shift to zero emission vehicles, a sustainable future for road transport will require wider system transformation, including support for active travel, public and shared transport, as well as addressing the full value chain impacts from vehicle production, use and disposal.”<sup>20</sup>*

**Effective emissions reduction**

A recent UK study<sup>21</sup> found that up to 24.4 million tonnes of CO<sub>2</sub> could be saved per annum by substituting e-bike use for car travel. The per capita emissions reduction arising from this mode shift is up to 750 kilograms per year per individual.

Another study in the US<sup>22</sup> has found that, for a 15% e-bike mode share, emissions could be reduced by 12% after accounting for e-bike emissions from electricity generation and induced e-bike trips.

<sup>19</sup> <https://sensibletransport.org.au/project/transport-and-climate-change/>, accessed 25/10/22

<sup>20</sup> <https://www.gov.uk/government/publications/cop26-declaration-zero-emission-cars-and-vans/cop26-declaration-on-accelerating-the-transition-to-100-zero-emission-cars-and-vans>, accessed on 25/10/22

<sup>21</sup> <https://doi.org/10.1016/j.tranpol.2021.11.019>, accessed on 27/10/22

<sup>22</sup> <https://doi.org/10.1016/j.rser.2019.109544>, accessed on 27/10/22

If achieved, these outcomes could exceed the equivalent emission reductions for electric vehicles. A Tesla Model S electric vehicle, charged on the Victorian grid emits 209.1 grams of CO<sub>2</sub> per kilometre travelled (PKT), whereas an e-bike emits only 6 grams of CO<sub>2</sub> PKT.<sup>23</sup>

### Urban last mile freight

The last mile problem comprises one of the most costly and highest polluting segments of the supply chain in which companies deliver goods to end customers.<sup>24</sup>

In information provided for this submission<sup>25</sup> Siddharth Shanker, General Manager, Zoomo Australia who provide LEVs to for delivery in Australia, Europe and the US, said

“the demand for urban last-mile delivery is expected to grow by 78 percent by 2023, leading to 36 percent more delivery vehicles in the world’s top 100 cities. This will result in a 30 percent increase in carbon emissions. With these figures front-of-mind, logistics providers and retailers need to change their approach to delivering goods in cities.

“Light electric vehicles (LEVs), like e-bikes and e-cargo bikes, are proving to be a fast, green and economical solution to complete deliveries in urban centres. Based on calculations by Zoomo, e-bikes can enable more than 10 times as many deliveries as vans (even electric vans) with a quarter of the CO<sub>2</sub> emissions.

“These figures underscore the enormous potential for LEVs to accelerate the transition to cleaner logistics and are the driving force behind why Zoomo is seeing more customer conversations regarding LEVs than ever before,” Mr Shanker said.

In London, it has been identified<sup>26</sup> that, electric cargo bicycles make deliveries 60% faster than delivery vans, with electric cargo bikes were capable of making 10 deliveries per hour on average in urban areas, while delivery vans recorded just 6 deliveries in the same period.

Along with time efficiencies, compared to diesel vans, the cargo e-bikes cut emissions by 90%. Even compared to electric vans, cargo e-bikes had 30% fewer emissions.

The particular attributes of transport for last mile freight warrant serious consideration of inclusion of LEVs as part of the National EV Strategy.

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<sup>23</sup> <https://doi.org/10.1051/e3sconf/201913601009>, accessed on 25/10/22 and referenced previously above.

<sup>24</sup> <http://dx.doi.org/10.1080/13675567.2014.907397> accessed 30/10/22

<sup>25</sup> Information and commentary provided by Siddharth Shanker, General Manager, Zoomo Australia on 28/10/22.

<sup>26</sup>

<https://static1.squarespace.com/static/5d30896202a18c0001b49180/t/61091edc3acfda2f4af7d97f/1627987694676/The+Promise+of+Low+Carbon+Freight.pdf> accessed on 29/10/22.



## Submission Response

Responses to questions have been included where they are relevant and support the inclusion of e-bikes, micro-mobility and LEVs as part of the Strategy, and where suggestions are relevant to increasing the impact of the Strategy in achieving its objectives.

### 2.2 Objectives

#### 1.

Do you agree with the objectives and do you think they will achieve our proposed goals? Are there other objectives we should consider?

We support the proposed objectives to increase demand, supply of affordable and accessible EVs across all segments.

We call for the inclusion of other accessible and more affordable e-bikes and LEVs in the definition of EVs under this strategy. This would contribute to ensuring the transition of the Australian transport fleet can be accomplished more rapidly, a significant proportion of the passenger transport task for daily short trips can be met through e-bikes and other active modes and that the goals and objectives of the Strategy could be met more rapidly and at lower cost.

As discussed previously, a range of incentives have resulted in strong uptake of e-bikes and reduction in emissions for avoided ICE vehicle trips in countries around the World.

One significant goal that should be considered as part of the Strategy is recognition of the need to address transport equity as a key consideration when providing incentives for EVs.

Even with targeted incentives for EV purchase, the cost to acquire EVs is out of the reach of many Australians, a fact acknowledged throughout the discussion paper.

- With 24 percent of Victorian and New South Wales 16 – 24 year-olds now choosing not to hold a driver's license<sup>27</sup> Australia's future transport must cater for the needs of this rapidly growing transport cohort, one that is based heavily on the shared economy (bike share, scooters, car share) as opposed to an 'ownership' economy with the expectation of a 'requirement to own a car'.
- With the total annual costs of car ownership in the order of \$7,000 to \$14,000 or more,<sup>28</sup> and the increasing use of shared mobility and e-mobility options, it seems likely the trend of young Victorians and young people from NSW to choose not to hold a driver's license will continue.
- Given the high proportion of trips in cities each day in Australia that are around five kilometres or less – around half – there is arguably an economic case to be made for providing those on low incomes a bicycle, including safe paths to ride them on, reducing

<sup>27</sup> ITS Australia, *Mobility as a Service in Australia – Customer insights and opportunities*, Port Melbourne Australia, 2018.

<sup>28</sup> <[www.racq.com.au/cars-and-driving/cars/owning-and-maintaining-a-car/car-running-costs](http://www.racq.com.au/cars-and-driving/cars/owning-and-maintaining-a-car/car-running-costs)>, accessed on 13/11/2019.

both cost of living pressures and the expenditure needed for maintaining and expanding the road network.

- Modelling for the provision of purchase subsidies for e-bikes in Australia has shown to have up to a 3:1 return on investment.<sup>29</sup>
- Short-distance, local trips are also likely to increase into the future, due to greater uptake of remote work and study. Additionally, we are likely to see growth in the '20-minute city' style of urban planning across our capital cities<sup>30</sup>, which will mean that more people will access goods and services locally. This is likely to strengthen the preference and/or suitability for e-bikes as an accessible and convenient travel option.
- Reducing inequality and lack of access to transport for users with a disability should also be considered in the Strategy. LEVs can respond to social and transport disadvantage and overcome the regressive nature of the existing transport system.



**Above:** Mark uses the Perth shared paths to travel up to 40 kilometres from his home near Perth city to Fremantle and back on Saturday outings but could not do so without the high quality shared and separated infrastructure. Conversation with Stephen Hodge, Perth 2017.

- Disability access can be transformed with access to appropriate high-quality modifications for e-wheelchairs, e-trikes and other micro-mobility devices, allowing local area access to jobs and services, local activity centres and public transport for those using mobility aids.

We have outlined the huge opportunity to shift some of the 50% of all trips for all purposes each day in this country which are 5km or less, to a variety of e-bike, public transport or micro-mobility.

The measures to accelerate uptake of EVs will be inaccessible to many Australians for years, and the pace of transition of the fleet will be correspondingly slow. Consideration of incentives for e-bike uptake has the potential to be very cost-effective, likely to result in a rapid shift in transport behaviour and arguably address accessibility and transport equity considerations.

<sup>29</sup> [https://www.weride.org.au/wp-content/uploads/2022/04/WeRide\\_e-Bike\\_Subsidy\\_Report\\_FINAL-lores.pdf](https://www.weride.org.au/wp-content/uploads/2022/04/WeRide_e-Bike_Subsidy_Report_FINAL-lores.pdf)

<sup>30</sup> Da Silva et al. (2019). Accessibility in practice: 20-minute city as a sustainability planning goal. Sustainability 12(129). <http://dx.doi.org/10.3390/su12010129>.

A key advantage for incorporating e-bikes into the Strategy is that the market growth is already well underway. In 2021, roughly 75,000 e-bikes were sold in Australia.<sup>31</sup>, three times the amount of electric vehicle sales.

With a rapidly growing national e-bike 'fleet', the stage is set to ensure the Strategy has a broader range of possible actions it can consider to motivate consumers to consider a larger range of transport options, including e-bikes, that could have profound impacts for facilitating mode shift and achieving the Strategy's goal of reducing emissions.

## 2.3 Actions

### 2.

What are the implications if other countries accelerate EV uptake faster than Australia?

Internationally, countries are already far ahead of Australia in developing a multi-modal, active and affordable transport systems with incentives for adoption of new technology across the board.

Europe is currently subject to a looming energy crisis following Russia's invasion of Ukraine and they must rapidly reduce reliance on Russian oil. The need to find alternative, cleaner transport has vastly accelerated. The EU Transport Commissioner is negotiating for a major initiative on provision of infrastructure to boost active transport to replace 12% of fuel needed for road transport by growing use of active travel modes, walking, cycling and public transport<sup>32</sup>.

In a major public address on 30 June 2022, the European Commission First Vice-President, Frans Timmermans, announced that the European Commission would work with the European Parliament towards an "inter-institutional European declaration on more cycling in Europe."<sup>33</sup>

E-bike sales in the US are outpacing those EV cars<sup>34</sup>. While 608 000 EV and trucks were sold in 2021, more than 880 000 e-bikes were purchased, almost doubling the number purchased in 2020. This is largely due to increased affordability of e-bikes, socially progressive e-bike subsidies and the rising cost of fuel.

E-bike use is booming globally due to the multiple benefits of convenience, affordability and accessibility for all age groups. It is a healthy transportation mode that contributes to lower traffic congestion and emissions in urban environments.

<sup>31</sup> Figure supplied by Bicycle Industries Australia.

<sup>32</sup> Personal communication with Mr Kevin Mayne, CEO of Cycling Industries Europe, 20 September 2022 and <https://cyclingindustry.news/bike-industry-political-will-to-grow-cycling/> accessed on 25/10/22.

<sup>33</sup> <https://www.insidethegames.biz/articles/1125106/europe-cycling-revolution-bicycle-summit>, accessed 25/10/22

<sup>34</sup> <https://www.bicycling.com/news/a39838840/ebikes-are-outpacing-electric-car-sales-in-the-us/>, accessed 25/10/22

## 2.4 Review

### 3.

What are suitable indicators to measure if we are on track to achieve our goals and objectives?

A large range of indicators could be considered for use depending on the specific goals and objectives contained in the final Strategy. They may include the following:

- Reduction in internal combustion engine (ICE) vehicle kilometres travelled (VKT)
- Reduction in KG CO2 emitted per VKT
- Mode shift from cars to PT, bikes, walking, active travel
- Air pollution
- Growth/decline in e-bike sales from baseline (pre-Strategy)
- Variation (%) in mode shift (e.g., from ICE vehicle to e-bike)
- Number of kilometres travelled by e-bike/non-motor vehicular modes/active travel
- Uptake of incentivisation schemes
- Transport mode satisfaction surveys
- Growth/decline in fuel purchases
- Growth/decline in ICE vehicle sales
- Road trauma.

## 3.1 Encourage rapid increase of demand for EVs

### 4.

Are there other measures by governments and industry that could increase affordability and accessibility of EVs to help drive demand?

1. The Strategy places extensive emphasis on building the specific infrastructure for a national EV charging network to support drivers of EVs.
  - Charging for e-bikes and light electric vehicles is simpler, quicker and much more affordable, similar emphasis should be placed on the infrastructure and facilities that encourage the use of e-bikes. Provisions for secure parking and charging of e-bikes should be made in all situations and alongside EVs where appropriate.
2. The current inconsistencies in FBT treatment and import duty on e-bikes compared to recent changes for EVs should be changed to provide a level playing field. Specifically, the FBT waiver for work use of e-bikes should be extended to all use and the 5% import tariff should be removed.
3. Incentives should be considered for business to use zero carbon transport for first and last mile freight deliveries.
4. Many examples of e-bike subsidies have garnered international attention. Examples of e-bike subsidies in Denver, Paris, Ireland and Stockholm have attracted international attention due to their affordability, rapid uptake and transformative results. A common success factor is the

rapid engagement of significant participating population groups who would not otherwise be able to afford a second-hand EV – a beneficial outcome in accelerating the transition to low carbon mobility.

- a. **Case study 1:** Denver, Colorado, e-bike rebates of between \$400- \$1700 '*are so hot they're gone within minutes*'.<sup>35</sup>
- b. **Case study 2:** Combined with championing safe bicycle infrastructure, France<sup>36</sup> is offering up to 4000 Euros to trade in the car and buy an e-bike
- c. **Case study 3:** Irish families are being offered a 3000 Euro tax incentive.<sup>37</sup> to buy cargo bikes,
- d. **Case study 4:** Stockholm.<sup>38</sup> has introduced the world's most affordable e-bike share service that pays for itself through advertising.

## 5.

Over what timeframe should we be incentivising low emission vehicles as we transition to zero emission vehicles?

1. Incentives should be linked to achievement of specific program targets as part of the Strategy. Once the targets are met then clearly the program has met its objectives and incentives should cease.

## 6.

What information could help increase demand and is Government or industry best placed to inform Australians about EVs?

1. Public information on the relative costs of trips undertaken by various modes could be undertaken as part of government communications campaigns.
2. All stakeholders engaged in e-bikes and micro-mobility could share good news stories and information regarding incentives via their communications platforms.
3. Behaviour change campaigns that aim to normalise bike-based travel are valuable. E-bikes (and conventional bikes) should be framed as an all-purpose vehicle that can be used by people of all ages and abilities. They should be framed as accessible: they are affordable, ideal for short daily trips and you don't need a pre-requisite level of fitness. E-bikes can be used for accessing goods and services as much as they can be used for recreation.

<sup>35</sup> <https://www.bloomberg.com/news/articles/2022-10-13/denver-e-bike-rebates-offer-lessons-for-other-cities>

<sup>36</sup> <https://momentummag.com/france-offers-e4000-e-bike-subsidy-but-theres-a-catch/>

<sup>37</sup> <https://www.irishtimes.com/ireland/2022/10/20/tax-incentive-of-3000-aims-to-boost-use-of-cargo-bikes-by-families/>

<sup>38</sup> <https://www.vice.com/en/article/g5vm8x/stockholm-thinks-it-can-have-an-electric-bikeshare-program-so-cheap-its-practically-free>

### 3.2 Increase supply of affordable and accessible EVs to meet demand across all segments

<p><b>7.</b> Are vehicle fuel efficiency standards an effective mechanism to reduce passenger and light commercial fleet emissions?</p>
<p>Not applicable to e-bikes and micro-mobility</p>
<p><b>8.</b> Would vehicle fuel efficiency standards incentivise global manufacturers to send EVs and lower emission vehicles to Australia?</p>
<p>Not applicable to e-bikes and micro-mobility</p>
<p><b>9.</b> In addition to vehicle fuel efficiency standards for passenger and light commercial vehicles, would vehicle fuel efficiency standards be an appropriate mechanism to increase the supply of heavy vehicle classes to Australia?</p>
<p>Not applicable to e-bikes and micro-mobility</p>
<p><b>10.</b> What design features should the Government consider in more detail for vehicle fuel efficiency standards, including level of ambition, who they should apply to, commencement date, penalties and enforcement?</p>
<p>Not applicable to e-bikes and micro-mobility</p>

#### Heavy vehicles

<p><b>11.</b> What policies and/or industry actions could complement vehicle fuel efficiency standards to help increase supply of EVs to Australia and electrify the Australian fleet?</p>
<p>Not applicable to e-bikes and micro-mobility</p>

**12.**

Do we need different measures to ensure all segments of the road transport sector are able to reduce emissions and, if so, what government and industry measures might well support the uptake of electric bikes, micro-mobility and motorbikes?

1. This submission provides an extensive case for the inclusion of measures to support the uptake of electric bikes and micro-mobility.
2. We submit that the Commonwealth should include all relevant modes in a national EV Strategy that will support the transition of the transport fleet for a low carbon future and specifically e-bikes and other micro-mobility modes.
3. We further submit that Ministers Chris Bowen and Catherine King should convene a national Ministerial Roundtable to agree on a coordinated approach to ensuring positions and incentives for EVs, e-bikes and LEVs are mutually supportive and coordinated and consider alignment with existing state and territory EV and Active Travel strategies.
4. We submit that the Commonwealth could utilise their infrastructure funding to encourage adoption by state and territories of measures and initiatives included in the Strategy and for other key measure to accelerate transport transition nationally irrespective of mode.
5. We submit that the opportunity for mode shift to rapidly transition daily trips to active travel and public transport with targeted initiatives in infrastructure, purchase/tax incentives and communications is significant and should be pursued as part of the Strategy.

## New and second hand EVs and hybrids

**13.**

How could we best increase the number of affordable second hand EVs?

1. The signatories to this submission see no reason that if e-bikes and micro-mobility are included as part of a national strategic approach to transition to low or zero carbon transport that a target of 10% of governments fleets for e-bikes and micro-mobility should not be obtainable.

**14.**

Should the Government consider ways to increase the supply of second hand EVs independently imported to the Australian market? Could the safety and consumer risks of this approach be mitigated?

Not applicable to e-bikes and micro-mobility

### 3.2.1 Strengthen Australia's competitiveness in the EV value chain

**15.**

What actions can governments and industry take to strengthen our competitiveness and innovate across the full lifecycle of the EV value chain?

Not applicable to e-bikes and micro-mobility

**16.**

How can we expand our existing domestic heavy vehicle manufacturing and assembly capability?

Not applicable to e-bikes and micro-mobility

**17.**

Is it viable to extend Australian domestic manufacturing and assembly capability to other vehicle classes?

Not applicable to e-bikes and micro-mobility

### 3.3 Establish the systems and infrastructure to enable rapid uptake of EVs

**18.**

Are there other proposals that could help drive demand for EVs and provide a revenue source to help fund road infrastructure?

Not applicable to e-bikes and micro-mobility



**19.**

What more needs to be done nationally to ensure we deliver a nationally comprehensive framework for EVs?

1. A nationally comprehensive framework should include all relevant modes into the strategy to address accessibility, affordability, equity, safety and wider benefits issues related to our current road transport system.
2. A nationally comprehensive framework should include LEVs, e-bikes and micro-mobility as efficient, cost-effective and low-carbon modes of transportation. They have the capacity to support business effectively in urban centres because the last mile is the most expensive and carbon intensive part of the logistical supply chain. Encouraging e-bikes as part of the EV strategy would help avoid the problem of congestion costs that EVs do not solve, enabling cities to grow whilst maintaining their competitive edge.
3. E-bikes and E-cargo bikes are increasingly popular replacement vehicles and up to 80 times cheaper. Any incentives provided to these modes are likely to provide a greater level of benefits compared to EV incentives.

How can we best make sure all Australians get access to the opportunities and benefits from the transition?

1. All initiatives to invest in transitioning the transport fleet to low or no-carbon modes should include measures to make the choice to ride an e-bike or other related device easier, safer and more convenient.

Refer to case studies in Q4 which target a much broader population base.

END OF SUBMISSION

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