AADA
AUSTRALIAN AUTOMOTIVE DEALER ASSOCIATION

2024-2025 PRE-BUDGET SUBMISSION

JANUARY 2024

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FOREWORD

The Australian Automotive Dealer Association (AADA) welcomes the opportunity to make a submission for consideration by the Government in the preparation of its 2024-25 Budget. Our submission details a number of recommended measures aimed at encouraging the uptake of low and zero emission vehicles, modernising Australia's automotive taxation regime and supporting training and skills in the automotive sector.

The AADA is the peak industry advocacy body exclusively representing franchised new car Dealers in Australia. There are around 600 new car Dealers in Australia that operate over 3,100 dealerships. New car Dealers range from family-owned small businesses to larger and publicly owned businesses operating in regional Australia and capital cities across the country. Franchised new car Dealers employ more than 56,000 people directly with a total economic contribution of over $17 billion.

Over the past few years, the automotive industry has continued to undergo unprecedented change, with 2020 being the lowest new vehicle sales year for almost a decade and 2023 setting a new record with over 1.2 million new vehicles sold. In the meantime, the industry has continued to navigate new challenges, from supply chain issues to semi-conductor shortages. As with many sectors in the economy, the automotive industry has also struggled with labour shortages and recent changes to semi and skilled migration programs. This in turn affects productivity, increases labour costs and presents risks to road safety as motorists experience longer wait times to have their cars serviced and maintained.

Section 1

As Australia faces a continued period of slowing economic growth due to relative high interest rates and global economic uncertainty, effective ways to improve economic and environmental outcomes through targeted measures that support other key Government agendas must be considered.

The measures proposed in our submission seek to support the uptake of electric vehicles (EVs) and supporting infrastructure, bringing us in line with international jurisdictions and on a clear path to meet our international climate commitments. Modernising Australia's taxation scheme will bring our system in line with current market dynamics and encourage the uptake of safer, cleaner and more efficient vehicles. Lastly, we recommend support for Australia's automotive workforce to encourage the more than 56,000 directly employed by new car Dealers and the almost 400,000 employed in the wider automotive sector to keep track with new technologies and ensure our vehicles can be serviced and maintained in a timely manner.

James Voortman
Chief Executive Officer

AADA RECOMMENDATIONS

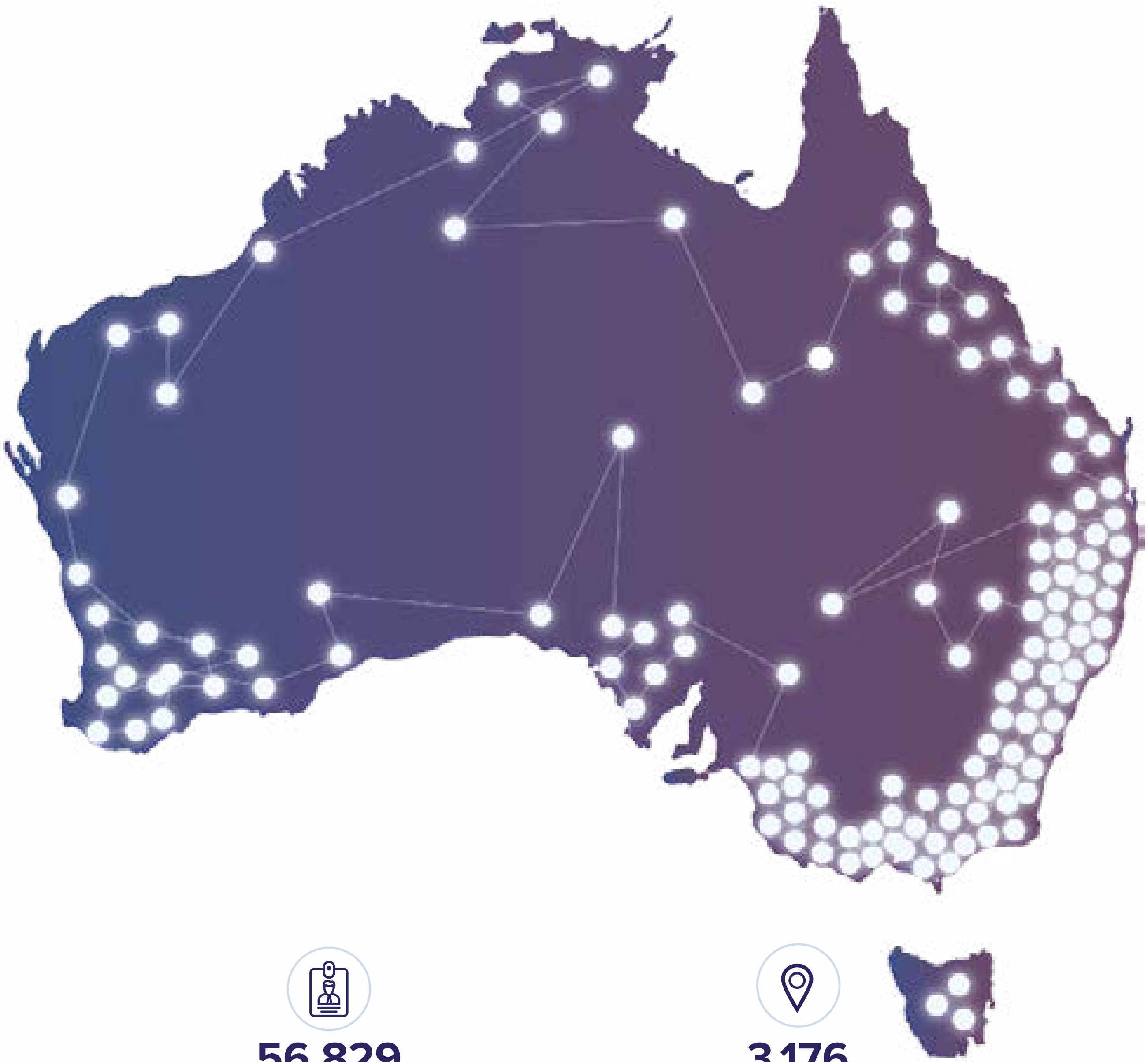
1. Support the Transition to Electric Vehicles
    a. Make available national and universally accessible purchase incentives
    b. Encourage investment in EVs and supporting infrastructure
    c. Continue the Fringe Benefit Tax Exemption for EVs and reverse the exclusion of PHEVs in 2025
    d. Review recent changes to the Luxury Car Tax fuel-efficient vehicle threshold
    e. Develop a national plan for the coordinated roll-out of charging infrastructure

2. Modernise Automotive Taxation
    a. Undertake a comprehensive root and branch review of Australia's automotive tax regime
    b. Abolish or reform the Luxury Car Tax
    c. Abolish the Passenger Vehicle Tariff
    d. Take a national approach to road user charges

3. Encourage Business Investment

4. Support Australia's Automotive Workforce
    a. Support measures to address Australia's skills shortage
    b. Promote intake of skilled migrants
    c. Improve opportunities for training in the automotive sector

Australia



56,829
Dealer Employees

3,176
Dealerships

$68.4 billion
Sales/Turnover

$17.3 billion
Total Economic Contribution

SUPPORT THE TRANSITION TO ELECTRIC VEHICLES

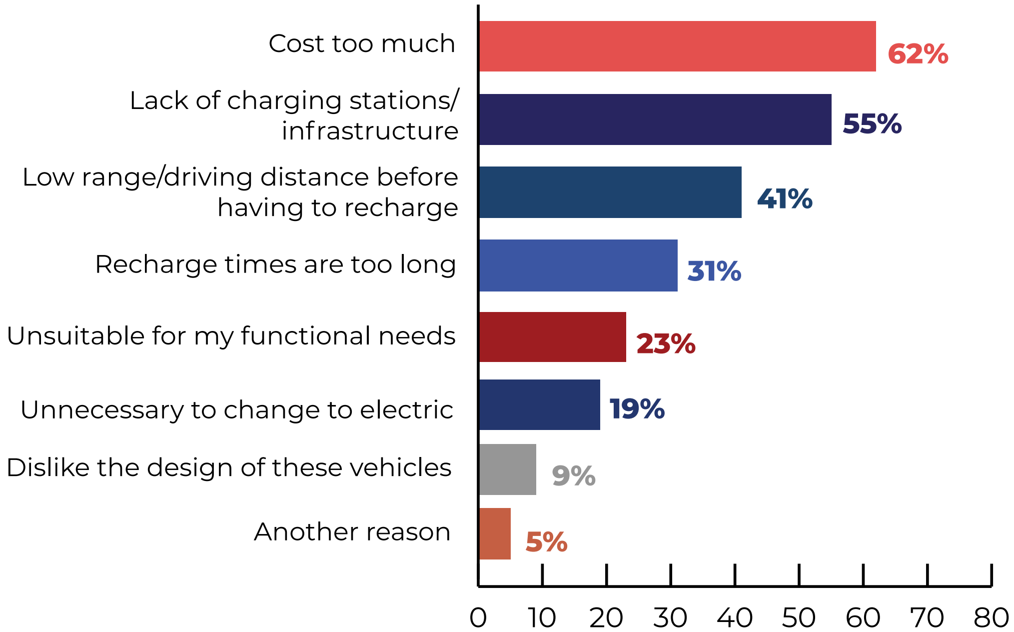
The automotive industry is experiencing a significant period of change as industrialised nations throughout the world are actively encouraging the uptake of lower emissions vehicles to reduce their CO2 emissions. It is often said that Australia is lagging behind the rest of the world in embracing EVs. In fact, Australia has made significant progress in relation to EV uptake in 2023 and the percentage of EV sales is now comparable to nations like the United States and Canada. The number of makes and models and affordability of product in Australia is on par with a similar right-hand drive markets like the UK. The country has also made strides in relation to increasing the number of public chargers to support the growing number of EVs on our roads.

The progress in relation to EVs is remarkable given the lack of Government investment relative to other like-minded countries. The US, EU and China have been providing generous incentives for a good number of years. In recent years, the Federal Government has introduced the FBT exemption for EVs and it has also relied on several state and territory governments to provide a combination of purchase incentives and taxation discounts. These have undoubtedly played a role in the increased uptake of EVs. However, the scale of these investments are not as generous as other markets and access to cheaper EVs has not been made available to all Australians. Instead, an Australian's ability to secure a subsidy or tax discount for an EV depends on which state they live in and whether the option of a salary-packaged vehicle is available to them.

Furthermore, states and territories are now actively phasing out purchase incentives for EVs and the Federal Government is moving towards narrowing the range of EVs exempt from FBT by removing PHEV eligibility in 2025.

The need for further Federal Government investment to promote EVs is even more important in the context of its plans to establish a Fuel Efficiency Standard (FES) which will compel car manufacturers to sell lower emitting cars.

REASONS CONSUMERS ARE UNLIKELY TO CONSIDER AN EV



Source: Zing!nsights EV & Hybrid Vehicle Insights Report - September 2022

The AADA is supportive of a FES, but examples around the world show that these standards need to be supplemented by measures which bridge the large price gap between EVs and their petrol/diesel equivalents.

The implementation of a FES will have budgetary implications through penalties whereby manufacturers that exceed the standard will be subject to monetary penalties for breaches. As such, to ensure a smooth transition to lower emitting and zero emission vehicles, incentives both financial and non-financial must be part of a suite of solutions involved in the establishment of the FES.

The Government should consider the below initiatives to make EVs more accessible to more Australians.

PURCHASE INCENTIVES

Where Australia clearly falls behind Europe, the United States, China and others is in the lack of a national universally available purchase incentive for EVs. Buying an EV still costs significantly more than an equivalent internal combustion engine vehicle (e.g. the cost for a Hyundai Kona petrol begins at $35,785, compared to the Hyundai Kona EV which begins at $58,847) and countries which have enjoyed significant levels of uptake have typically provided financial incentives for consumers and businesses to make the leap into an EV.

Other jurisdictions which have implemented a FES have paired it with a strong and broad package of incentives aimed at improving the affordability, demand and supply of EVs. For example, The United States has tax credits of up to $7500 available for Plug-in and Fuel Cell EVs and China has introduced an exemption from sales tax up to a maximum of 30,000 yuan for EVs purchased in 2024 and 2025.

In order to follow suit, an ambitious and achievable FES accompanied by strong incentives will ensure Australians are not compromising affordability and choice of vehicles.

EV INVESTMENT INCENTIVES

Around 40% of new vehicle purchases are completed by business or rental fleets and encouraging this category of buyer will be crucial to the uptake of lower emissions vehicles.

The AADA has continued to be supportive of previous investment incentives available to businesses and individuals including temporary full expensing and the instant asset write-off. The current $20,000 limit available for small businesses for the 2024 income year will have no effect on incentivising businesses to purchase EVs for their fleets. The Government should consider providing investment incentives or accelerated depreciation for EVs under the LCT threshold. This should also be made available for all businesses regardless of turnover.

Many businesses seeking to provide EV chargers will face significant costs not only for charging hardware but potentially also for upgrades to local electricity grids. Dealerships seeking to install fast chargers in their Dealerships have often had to abandon the project when the financial requirement to upgrade the grid has rendered the investment unviable.

With expanded criteria, businesses will be much more likely to invest in new technologies such as EVs and charging infrastructure which will help to meet government commitments and standards.

EV FRINGE BENEFIT TAX EXEMPTION

The AADA commends the Government on the Fringe Benefit Tax (FBT) exemption for EVs and urges its continuation. However, the Government needs to urgently revisit excluding plug-in hybrid electric vehicles (PHEVs) from the scheme in April 2025. It is becoming increasingly clear that Australia will have few if any affordable battery electric vehicle (BEV) utes and larger SUVs available in the foreseeable future. For example, the only BEV ute on the market in Australia costs almost $93,000 –more than double that of the petrol or diesel equivalent which comes with the added benefit of off-road capability among other performance features.

It will clearly take time for the technology to arrive to make these larger vehicles affordable and capable in a BEV format. Until that time, hybrid including PHEV vehicles provides a transitionary technology for utes and SUVs which are incredibly popular in the Australian market. If PHEV vehicles are excluded from future FBT exemptions, prospective buyers are more likely to stick with petrol and diesel variants, which have an adverse impact on the environment.

LUXURY CAR TAX

The AADA has long been opposed to the Luxury Car Tax (LCT) and will reiterate our opposition later in this submission. On the issue of the LCT's application to EVs – the AADA would urge a timely examination of the changes to the LCT announced in the 2023-24 mid-year economic and fiscal outlook (MYEFO) which apply to the fuel-efficient vehicle threshold.

The tightened definition of a fuel-efficient vehicle for the LCT through the reduction of the maximum fuel consumption from 7 litres per 100km to 3.5 litres per 100 km, means an increase in the tax paid on a range of vehicles that are generally considered more fuel-efficient than average. For example, a Toyota Kluger Grand Auto eFour will currently not pay any LCT, however, under the changes this same vehicle would pay more than $2500 in LCT (assuming a threshold of $71,849 for all vehicles and $84,916 for vehicles under 3.5L/100Km). This is counterproductive to the goals of encouraging the uptake of more fuel-efficient vehicles and should be urgently reviewed.

CHARGING

The anticipated increase in EVs will bring with it the need for an extensive network of charging infrastructure. The AADA would urge the Government to develop a national plan for the coordinated roll-out of charging infrastructure and introduce support for businesses and individuals installing charging infrastructure.

A strong charging network is vital for the transition to EVs, giving consumers the confidence to invest in these new vehicle types. The availability of charging stations including fast chargers, ensures that drivers can continue to drive their vehicles in the same manner that they would whether it is an Internal Combustion Engine (ICE) vehicle or EV. This transition to EVs will require a significant investment in the infrastructure of charging stations and the subsequent grid upgrades required the facilitate the installation of these chargers. Which means that businesses seeking to install fit for purpose charging infrastructure can often be up for over six or seven figure investments that often include necessary upgrades to the electrical infrastructure.

The AADA is supportive of the funding and grants available through the Australian Renewable Energy Agency and the Small Business Energy Incentive but would call for more localised support for smaller businesses seeking to install chargers. This is particularly the case for franchised new car dealers, they are at the forefront of this EV transition and due to the nature of dealerships' interactions with customers as the purchase, servicing and repair point, Dealers will be required to invest in charging infrastructure for not only their own business purposes but as a service provided to customers and possibly the wider community.

Section 3

The Government should also follow the lead of other governments around the world and provide assistance for the installation of home charging. Internationally there are extensive incentive schemes available for businesses and individuals who install charging infrastructure. For example, Germany which has maximum incentives of $13,000 and $120,000, respectively, for AC and DC infrastructure installation and in the US, in addition to rebates, businesses have access to the Alternative Fuel Infrastructure Tax Credit (AFITC) worth 30% of the purchase and install cost of commercial EV chargers up to $100,000.

MODERNISE AUTOMOTIVE TAXATION

COMPREHENSIVE ROOT AND BRANCH REVIEW

The AADA considers that there is a pressing need for a complete review of Australia's automotive taxation regime. As new technologies emerge and Australians turn to lower and zero emissions vehicles, Australia's taxation regime must keep pace to ensure our system continues to be fit for purpose.

There are several different automotive-related taxes at different levels of government which are often inefficient and outdated, a relic of an era when Australia manufactured vehicles, such as the Luxury Car Tax and Passenger Vehicle tariff. Each year, Australians pay tens of billions in these taxes with the Bureau of Infrastructure and Transport Research Economics reporting that in the 2021-22 financial year, almost $35 billion in road related taxes and charges were paid.

Increasing adoption of fuel-efficient vehicles, the use of alternative forms of road transport such as ridesharing services and the complete end of automotive manufacturing in Australia all demonstrate the vast technological and societal changes that the automotive sector has undergone over the past decade. The Victorian Government's unsuccessful bid at introducing a road user charge has also raised questions over the legality of other state based 'taxes on goods' such as stamp duty. As such, we urge the Federal Government to commence a program of consultation and design a comprehensive automotive taxation regime that is fit-for-purpose.

LUXURY CAR TAX

Each year, Australians pay tens of billions in motoring taxes and charges to governments and a considerable portion of that revenue comes from the Luxury Car Tax (LCT). In the 2022-23 financial year, the government collected over $1 billion in LCT revenue. The threshold for the tax currently applies to vehicles that are not necessarily 'luxury cars' but are often the most appropriate vehicles for individuals in regional areas with a significant need for a particular type of vehicle, for example, a Toyota Landcruiser. It also often dissuaded individuals from adding optional extras onto their vehicles which seek to improve safety for fear of pushing the purchase price of the vehicle over the threshold. This tax acts counterintuitively to the Government's stated goals of improving road safety and reducing transport emissions.

The AADA would call for the complete abolition of the LCT. The LCT was originally introduced as a means of protecting Australia's local vehicle manufacturing industry. With local manufacturing coming to an end in 2017, it just imposes unnecessary additional taxes on many vehicles, particularly more expensive lower emitting and EVs. The LCT disadvantages consumers seeking to buy new cars that deliver greater safety and environmental benefits.

The LCT also acts as a barrier to the renewal of the passenger vehicle fleet at a time when technological improvements continue to make new car models safer, more energy-efficient, and more environmentally friendly.

The AADA would also urge a timely examination of the changes to the LCT announced in the 2023-24 mid-year economic and fiscal outlook (MYEFO) which apply to fuel-efficient vehicle threshold. The tightened definition of a fuel-efficient vehicle for the LCT through the reduction of the maximum fuel consumption from 7 litres per 100km to 3.5 litres per 100 km, means that will increase the tax paid on a range of vehicles that are generally considered more fuel-efficient than average.

If the total abolition of the LCT cannot be contemplated within the next Budget cycle, then we propose reforms to the LCT, such as raising the threshold to target truly luxury vehicles and stage a sunset period for LCT, exempt low emission vehicles and exclude accessories from the calculation of whether a vehicle hits the threshold for paying the LCT.

PASSENGER VEHICLE TARIFF

Currently, import tariffs are applied on motor vehicles that are manufactured in, or imported from countries with which Australia does not have a Free Trade Agreement. Given the growing number of FTAs, including the prospective trade agreements with the EU, we believe that the Australian public would be best served by the Government removing existing tariffs from all passenger vehicles imported into Australia.

Trade policy experts say that the vehicle tariff will naturally fall away as part of the inevitable Free Trade Agreement with the EU. However, Free Trade Agreements can drag on and motorists should not be asked to hold their breath in the case of the EU where Australia is negotiating with a Union of 28-member states.

Consumers deserve immediate relief for new vehicles and so does industry, particularly those new car dealerships which have a disproportionate amount of product on their showroom floor which just happens to be manufactured in a non- FTA country.

ROAD USER CHARGE

It is well established that in the near future, Australia will need to change the way in which motorists pay for roads. Improvements in vehicle technology and consumer desires to purchase more fuel-efficient vehicles including hybrids and EVs, have seen fuel excise diminishing. With projections that more than 30% of new vehicle sales will be EVs by 2030, it is vital that the Government looks to establish an effective and equitable national road user charging system. In recent years states have sought to establish their own state-based road user charging systems, but following the invalidation of Victoria's Road User Charge on EVs the AADA would urge the Government to take a national approach to road charging to ensure national consistency.

The AADA acknowledges the fine line to be tread when introducing road user charges on new technologies. It is important that the introduction of any new charging system is done in a way that does not discourage the uptake of hybrids and EVs resulting in outcomes that are counterproductive to the Government's own climate goals. It is also important that any new charging system does not unfairly penalise people who continue to drive internal combustion engine vehicles. Any new charging system which seeks to phase out fuel excise with the introduction of road user charging should be done in a technology-neutral manner across all vehicles regardless of powertrain choice.

A national approach undertaken with extensive industry and community consultation can provide certainty to consumers and businesses alike about the future costs of low and zero emission vehicles and how road infrastructure will be paid for. The actual charging mechanism itself does not need to be complex, as a matter of fact the simpler and more transparent the system the greater expected buy in and support from the community. However, whenever user / consumption charges undergo systematic change, it will inherently be a complex process and comprehensive community consultation, education and appropriate lead times must be principles that the government works towards. The AADA would also urge that the analysis of changing road charging models should be undertaken as part of a wider review of automotive taxation as detailed above.

BUSINESS INVESTMENT INCENTIVES

Investment is a critical component in driving productivity and economic growth and while the Government's recent announcements such as the increase of the instant asset write-off threshold for small businesses from $1000 to $20 000 is welcome, the AADA considers more needs to be done.

Previously businesses were able to access the expanded instant asset write-off and previous Temporary Full expensing measure which helped encourage businesses to invest, driving productivity and economic activity. Initiatives which have historically proven effective in stimulating this much needed investment.

Franchised new car Dealers make substantial investments in facilities, machinery, and equipment to improve their ability to sell, service and repair vehicles for the community they serve. These investments also have significant flow-on effects for the communities in which they operate, as they use local builders, contractors, and other service providers. Investment is not limited to cities, with dealers across the country making significant investments that benefit country towns, and regional and suburban areas. These investments are much more likely to occur if all Dealers have access to investment incentives.

Under the current regime there are limited investment incentives available for Dealers, due to the turnover thresholds. While Dealers generally fall outside of commonly used definitions of small or medium sized businesses due to employee count or turnover, Dealers are often family run businesses which operate a vital function in the sale, servicing and repair of vehicles in the community. Often, they are unable to meet these threshold requirements due to turnover, but Dealers have very small profit margins, directly related to the high value of the product they sell.

It should also be noted that investment incentives have helped the many businesses which depend on commercial vehicles to invest in productivity enhancing vehicles. Newer vehicles are safer, cleaner and more efficient and providing incentives for businesses to replace ageing vehicles with newer vehicles represents a benefit for society.

Coming into a period of slow productivity growth and reduced business investment, the AADA would encourage the exploration of potential investment measures aimed at spurring business investment. We would also recommend revisiting the temporary full expensing and instant asset write off by adding investment incentives and accelerated depreciation for electric vehicles and commercial vehicles. Without these measures, it is likely that businesses will defer investment decisions.

SUPPORTING AUSTRALIA'S AUTOMOTIVE WORKFORCE

SKILLS SHORTAGE

As with many industries, franchised new car Dealers have experienced difficulties in sourcing and recruiting skilled workers for some years, with demand for these workers being exacerbated over the period of precautionary restraints on work and travel caused by the Covid pandemic. Jobs and Skills Australia (JSA) has identified a shortage of motor mechanics nationally in all States and Territories for the past three years. With the 2023 Survey of Employers who Recently Advertised (SERA) confirming that automotive employers often fail to find suitable applicants for jobs advertised.

The rate of success after advertising for employers in the automotive and engineering category was the lowest of all reported in the survey at just 24% in the June quarter 2023. Recruitment experiences like this become exasperating for employers and lead to some despair that suitable skilled workers can be found.

Increasing the availability of skilled people is an important long-term industry objective. A consistent planned effort is required by Governments, educators, and industry to ensure that relevant automotive training and skills development occurs through the determination of engaged employers, TAFE, Jobs and Skills Australia, and the Skills Council - the Australian Mining and Automotive Skills Alliance (AUSMASA).

AUSMASA reported that the largest impact is felt by the ongoing shortage of motor vehicle mechanics, which is the number one operational role in the industry, representing almost one-third of the operational workforce.

The AADA keenly awaits the completion of the National Skills Plan due in June 2024, the VET Workforce Blueprint, and the AUSMASA Skills Council Initial Workforce plan for the automotive industry.

The impact of skills shortages includes loss of productivity, increased labour costs to retain skilled technicians, and use of sub-standard labour requiring greater supervision, particularly in regional areas. There is also a huge risk to road safety as motorists experience longer wait times to have their cars serviced and maintained and a massive economic impact on businesses that depend on roadworthy vehicles to provide and obtain goods and services.

SUPPORT FOR AUTO WORKERS DURING THE TECHNOLOGICAL TRANSITION

Without good planning and available training, industry and consumers will suffer inadequate access to trained staff and delays in access to the automotive services that consumers expect to be delivered promptly. Dealers are cognisant of the ever-present consumer demands and the need to be out in front of the technological changes that are constantly arriving in the form of new vehicles.

A transition to electric vehicles (Hybrid, PHEV and BEV) is changing the automotive skills landscape. New skills and training will be in demand and critical to meeting the consumer demand for repair, maintenance, and servicing of these new vehicle types. In the meantime, as the vehicle population grows and the transition bridges ICE tech, hybrid, and pure electric vehicles, the need for workers in dealerships will increase and the skillset required to complete the necessary work across these new technologies will increase.

The AADA considers that training people now is imperative, with changes in vehicle technology work must go into ensuring a smooth transition in training staff to cope with the existing ICE fleet and the transition to new hybrid and electric vehicle architectures. Consultation with industry on the content of VET training packages will also be critically important.

As detailed above there is an urgent need to address the skills shortage in the industry, as such the AADA has outlined a number of measures below that could go some way towards reducing the critical skills shortage through training and migration.

TRAINING TO REDUCE THE CRITICAL SKILLS SHORTAGE IN THE AUTO INDUSTRY

The high level of demand for automotive workers in the franchised new car Dealer sector is likely to be a thorn in the side of growth and development of businesses.

The AADA supports and welcomes the measures taken by Government to improve the opportunities for training in the automotive sector through the likes of Jobs and Skills Australia (JSA) and the AUSMASA Skills Council. The AADA also supports the continuing development of initiatives to bridge the gap between demand for automotive technicians and availability of skilled people to do the work.

Minister for Skills and Training, Brendan O'Conner recently stated that '*close to half of Australia's future jobs will have a VET pathway and - anyone training as a mechanic, or a panel beater can look forward to a long and secure career in their trade*'. The AADA agrees and would call for continued action in this space and increased allocation of funding at a qualification level for vocational education and training to address these issues which will pay dividends in the employment market.

NATIONAL SKILLS PASSPORT PROPOSAL

The AADA considers that the National Skills Passport proposal is a valuable addition to the skills, training and employment landscape and should allow employees and employers to quickly verify qualifications and consolidate in one digital location all the necessary information that confirms vital skills and occupational qualifications.

Consultation and planning for implementation and a smooth introduction of the Skills Passport are important as is the acceptance by employers will be contingent on the development of a fit for purpose system that will also add value to skills attainment and planning.

SKILLS SHORTAGE LEADS TO INCREASED NEED FOR LOW, SEMI AND HIGHLY SKILLED MIGRANT WORKERS

The AADA considers that there is a significant opportunity for migration to help address the current skills gaps in the industry. Australia is well placed to attract international talent to the automotive industry but must continue to assess the key barriers to fully utilising the skilled migration pathway to assist in addressing skills shortages.

This includes the complex and costly navigation of the current sponsor visa programs and significant delays in the skills assessment process. Where employers are seeking to engage skilled migrants, the system should be easier to access, streamlined and readily understood by employers. The complexity and cost of the current arrangement work against the intended goals.

The Government should consider how initiatives such as the Pacific Australia Labour Mobility scheme can help to stimulate the intake of skilled migrants There should also be some consideration of removing or reducing the Skilling Australia Fund levy.

PACIFIC AUSTRALIA LABOUR MOBILITY (PALM)

The PALM scheme makes an important contribution to filling the employment and skills gaps that exist in rural and regional Australia. Franchised new car Dealers have identified that the PALM scheme could be of greater assistance in rural and regional Australia by providing workers in semi- skilled automotive occupations which can take pressure off and ease the workload on all dealership staff. There are numerous examples of franchised dealers utilising the PALM scheme to address local worker shortages by hiring workers from Pacific Island countries and Timor-Leste with great success.

Automotive businesses have relied on announcements made in Government policies and speeches which encouraged employers to engage people under the PALM visa conditions. Dealers who committed to the PALM scheme have operated successfully, with the scheme offering a mutually beneficial arrangement by improving workers technical knowledge and abilities and increasing business productivity.

The AADA is informed by Dealers that the PALM visa arrangements for Pacific Island and Timor-Leste workers are suspended and may not continue to apply to the automotive industry. Access for the automotive industry to the PALM visa scheme should be maintained and therefore assist to ensure that labour is available. As such, the AADA would urge the Government to allow the automotive sector to continue to access the PALM scheme and to commit to continuing support for the PALM visa arrangements which are important to employers in regional Australia.

CONCLUSION

We would be happy to meet with you to discuss our submission and participate in any further consultation. If you require further information or clarification in respect of any matters raised, please do not hesitate to contact me.

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