

Pathways Call for Evidence Submission

18 July – 14 August 2026

Submission type	Upload
Submitter	Intrepid Travel
Response ID	383052

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Submission to the NSW Net Zero Commission

Decarbonisation Pathways Call for Evidence

Link: [Decarbonisation pathways Call for Evidence | Net Zero Commission](#)

Consultation is open until 5pm Friday 31 July 2026.

Submission data: 30 July 2026

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About Intrepid Travel

[Intrepid Travel](#) is an Australian owned, Melbourne headquartered small group adventure travel company, operating since 1989 and a certified B Corp. We ran 1,318 trips across 118 countries and travelled with 317,880 customers in 2025. We operate our own vehicle fleet in Australia and buy from a global network of more than 10,000 suppliers, many of them small businesses. You can read about Intrepid in our Annual Report 2025. The report highlights the achievements we're proud of, the challenges we're working through and the actions we're taking as a certified B Corp to grow both profit and purpose.

We are one of many tourism businesses moving and servicing visitors in New South Wales. New South Wales welcomed [129.3 million visitors in the year ending March 2026, who spent \\$61.9 billion](#) in the state. This visitor economy of that scale is delivered largely by small businesses across metropolitan and regional New South We would encourage the Commission to read the barriers below as tourism sector-wide rather than a submission from Intrepid alone.

Intrepids carbon emissions profile & what we can control to decarbonize

Emissions figures in this report come from our [Climate-Related Disclosures 2025](#) (prepared under AASB S2, assured by PwC) and our [Integrated Annual Report 2025](#).

Emissions source	tCO2e (2025)	Share
Customer flights not sold by Intrepid	387,305	70.5%
Trips (on the ground)	85,323	15.5%
Accommodation	37,688,266.72	
Land Transport	7,910,433.86	
Land Transport (Fleet)	1,205,294.15	
Water Transport	4,655,363.65	
Air Transport	7,867,210.60	
Public Transport	4,254,517.89	
Meals	5,984,241.76	
Activities	3,421,973.22	
Waste	1,207,048.25	

Emissions source	tCO2e (2025)	Share
<i>Uplift (contingency)</i>	<i>11,128,666.89</i>	
Flights sold by Intrepid	59,390	10.8%
Offices	16,727	3.0%
Accommodation and airport transfers	796	0.2%
Total	549,541	100%

Source: Intrepid Climate-Related Disclosures 2025, Section 5.3 (market-based).

Note: Flights are 81 per cent of our footprint and are being addressed separately at a global level.

Intrepid published in 2025 a revised Climate Action plan. Intrepid Travel's Climate Action Plan focuses on significant emissions reductions and sustainability initiatives, including a \$2 million Climate Impact Fund and a commitment to reduce the intensity of the customer journey trip and airfare emissions (Scope 3) by 8% per customer per day by 2030 as well as 21% absolute reduction in Scope 1 and 2 emissions

We are an asset light business. Beyond the emission created by vehicles we own, a trip in NSW generates emissions through accommodation, activities, meals and waste, all delivered by New South Wales businesses and all sitting in Scope 3 in our GHG inventory. Our emissions and our decarbonisation levers therefore sit in different scopes and as a business we have different levels of control. To address our scope 3 emissions, we can support our suppliers to decarbonize i.e. solar installation or vehicle upgrade which we do where we can. However, we cannot make the investment decision for them. Policy that reaches tourism SMEs directly will address emission reductions that operators like us cannot.

On-the-ground transport represents 10% share of our trip emissions but close to the whole of what we directly control in a destination like New South Wales, and it is where state policy settings can support decarbonisation.

Question 1b: How could the NSW Government better stimulate private finance at the scale and pace needed for the net zero transition?

In 2025 we [retired our carbon offsetting program and shifted away from Science Based targets initiative](#), redirecting the money into a Climate Impact Fund that invests directly in emissions reduction. The fund is capitalised at approximately \$2 million a year through an internal carbon price applied to every trip and incorporated into the price at the point of purchase.

\$2 million a year can not finance a low carbon transition for a business like ours. The fund is used in the majority of cases for pilot projects where the operating risk is unknown. As a Fund principle, we look to leverage funds from other sources, including government grants, to reduce the risk of our investment to the business. Once operating risk is known, larger flows can follow through ordinary commercial channels:

- **Fleet capital expenditure.** We replace vehicles on a renewal cycle and that capital is committed regardless. Once a pilot establishes that an electric vehicle performs on a given route, the

replacement decision becomes a whole-of-life cost comparison rather than a speculative investment and electric vehicles become the preferred choice.

- **Procurement and contracting.** Specifying lower-emissions requirements across 10,000 suppliers directs far more value toward decarbonisation than the fund distributes, without us holding the capital. We can only ask suppliers for what we have established is achievable.
- **Supplier co-investment.** Where a supplier cannot carry the upfront cost, the fund can advance it, and the asset sits on their balance sheet.

As the fund was only established in 2026, we cannot yet estimate the total value redirected through these channels, but work to date suggests it will exceed the fund. The implication for public policy is that support concentrated at the pilot and first-of-kind layer may do more work per dollar than deployment subsidy as it carries the first-mover risk and we would encourage co-investment from Government where there is significant benefit to the sector more broadly and to accelerate the transition.

The caution we would add is that none of this helps where the constraint is supply rather than capital. Pilots cannot de-risk a technology that cannot be procured.

Question 2: What are the opportunities and barriers to technology development, deployment for each sector?

Our New South Wales operations and fleet

We run ten multi-day itineraries in New South Wales, from a [four day Sydney and Blue Mountains trip](#) to a [nineteen-day Sydney to Cairns journey](#), carrying groups of up to sixteen passengers between capital cities and regional towns, with luggage, for multi-day travel. This is long distance regional touring, not commuter travel, and the vehicle requirement is neither the passenger vehicle market nor the heavy vehicle market.

As of January 2026 we own 39 vehicles in Australia and hire if we have capacity gaps. None of those vehicles are currently electric. We are about to purchase our first 7-seater EV, funded entirely through our own Climate Impact Fund to pilot electric operation on Kangaroo Island, South Australia. We chose an island route because daily distances are predictable and charging can be met at a single depot. We are also choosing this route as 95% of our trips on Kangaroo Island are group sizes 6 or less.

Availability of electric vehicles in the domestic market

The core vehicle for small group touring is a 12 to 20 seat minibus, typically a 16 seater. We have been unable to source an electric vehicle in this class in Australia.

The New Vehicle Efficiency Standard applies to passenger and light commercial vehicles. A 16 seat minibus generally sits outside the categories it is designed to influence. The fringe benefits tax exemption is limited by vehicle type and directed at employee private use, not commercial passenger fleets. Heavy vehicle and bus programs are oriented toward urban route buses, a different class with different duty cycles.

The result is fragmented demand. Tourism operators, community transport, aged care, school transport, disability transport and regional shuttles all need vehicles in roughly this class, but no single buyer is large enough to justify a distributor bringing a model into Australia and supporting it with parts and service.

We recognise vehicle standards and fringe benefits tax are Commonwealth matters. We raise the gap as it is the largest barrier tour operator like us and the sector face. However, there are things a state government can do about it.

Charging infrastructure for touring operations

A touring vehicle cannot wait to charge. It must charge when it needs to, at the place listed in the itinerary as the schedule is fixed at the time of trip purchase. Our trips stop at restaurants for lunch, at national parks and activities for a few hours, and at accommodation overnight. Charging must be possible at those stops, reliably and without queuing. Currently, most charging bays are for passenger cars, so a 12 to 20 seat vehicle often cannot physically access them.

Destination charging at venues along established touring routes, sized for larger vehicles and specified for reliability, would be transformative for tourism fleet electrification and would also serve independent travellers, who are stopping at the same places.

What could help

- **Aggregate demand.** Convene tourism operators and DMOs, community transport providers and other small passenger fleet buyers to establish the combined market size for 12 to 20 seat electric vehicles, giving manufacturers a commercial reason to bring models into Australia.
- **Align government procurement.** State-funded school, community and disability transport fleets buy the same vehicle class, aligning specifications and timing would add public sector volume to the above demand
- **Support charging at regional tourism hubs.** Touring routes concentrate at predictable overnight points and charging at regional accommodation and tourism hubs serves visitor vehicles, operator fleets and residents from one asset.
- **Advocate to the Commonwealth on the vehicle class gap.** A state level submission identifying this segment as a gap would carry weight, particularly if supported by the above mentioned aggregated demand evidence.

Question 7: Beyond emissions reduction, what outcomes should be considered?

Three outcomes from our experience in regional destinations may be worth weighting in the pathways.

- **Economic benefits:** Touring routes bring visitor spending into regional towns that receive little other through traffic, and a charging stop is where money is often spent.



- **Shared use in low density areas.** In regional New South Wales one charging asset can serve tourism fleets, independent travellers, community transport, council fleets and residents. Treating tourism demand as part of the utilisation case rather than a separate problem improves the economics of regional charging.
- **Social and environmental benefit:** Much of our New South Wales operation runs in and around national parks, including the Blue Mountains. Diesel minibuses affect local air quality and visitor amenity in the places where the experience is the product. [University of Sydney](#) researchers note that buses are a large source of air pollution, and that battery electric vehicles eliminate tailpipe emissions, with local air quality improving even at modest levels of uptake. These benefits are not captured in tonnes of CO2e calculation.

Why this matters beyond our own fleet

If a commercial operator can run scheduled multi-day touring routes across New South Wales using electric vehicles, carrying paying passengers to a fixed itinerary with no tolerance for a failed charging stop, then anyone can do it. Independent travellers currently avoid electric vehicles for regional trips largely because they cannot judge in advance whether charging will support the route. Uncertainty, not vehicle capability or charging infrastructure, is the barrier, and a demonstrated commercial route resolves it in a way information campaigns do not. As a business, we always are willing to share the results of our climate work to encourage other businesses (as well as individuals) to also commit to Climate Action.

We are happy to provide further operational data on request, including on a confidential basis where commercial sensitivity applies.

Contact

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