



# Action for Public Transport (N.S.W.) Inc.

P O Box K606  
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10 March 2017

The Director  
Fuel Quality Standards Section  
Environment Standards Division  
Department of the Environment and Energy  
GPO Box 787  
Canberra ACT 2601  
email: [vemissions@infrastructure.gov.au](mailto:vemissions@infrastructure.gov.au)

Dear Director,

## Vehicle Fuel Efficiency R.I.S.

### Submission in response

Action for Public Transport (NSW) is a transport advocacy group, which has been active in Sydney since 1974. We promote the interests of beneficiaries of public transport; both passengers, and the wider community. We make the following submission on the draft Regulatory Impact Statement.

We note a large volume of discussion about reducing emissions, including the documents open for comment until 10 March 2017. There are many chapters on fuel quality, types of fuel, exhaust treatment standards and other matters. However we are unable to find any reference to **causing people to drive less**.

We therefore suggest that steps be taken to engage the States in a program to reduce urban emissions by means including:

- Road access pricing
- Urban design
- Public transport improvements
- Cancelling motorway expansions
- Removing tax concessions to tollway companies, who have an interest in perpetuating heavy traffic
- Shifting car taxation away from ownership and toward usage

(Jim Donovan)  
Secretary