

I live in the southern suburbs of Adelaide, and look out most mornings on the brown cloud of smog hanging over the city, before heading in to work. Most of Adelaide's schools are located next to main roads, resulting in poor air quality for our children; residents who wait for buses or walk with their children along major roads to get to school are having their health impacted. Petrol stations in Australia have some of the weakest vapour reduction regulations in the world, exposing residents and workers near petrol stations to poisonous fumes. I am also concerned about our reliance on foreign supplies of oil for transport. Furthermore, the contribution of transport to climate change needs to be rapidly reduced, to ensure continued stability and food and water supply.

For these reasons I **encourage the adoption of a strong FES**, expected to reduce emissions at least as rapidly as the FES adopted in NZ.

Emissions level limit should start strong, to more rapidly reduce emissions.

FES shouldn't be considered in isolation from other social/policy objectives such as improvement in air quality, road safety, and reducing road maintenance costs. The increasing abundance of SUVs on our roads has been found in multiple studies to be a factor in increasing pedestrian deaths, and hence the FES should ensure it does not incentivise the sale of only larger cars. At a minimum the FES should flatten the limit curve similarly to NZ. Consideration should be given to going beyond flattening the curve, to turning it back down again in order to disincentivise (but still allow) extra-large passenger vehicles. The lower limit of 1,200kg for flattening should remain, to encourage more small cars on our streets.

There should be some allowance for credit banking, transferring and/or pooling, but with short expiries. This would incentivise continued overachievement. Fines or penalties should be applied to suppliers who accumulate too many debits.

The FES should either begin immediately or after a short period (no more than 3 months). Suppliers should already be anticipating the legislation, and the need to urgently reduce emissions means that this legislation should enter into force as soon as possible.

For emissions testing, conversion to WLTP should be allowed for existing models, but not new ones (which must use the more reliable WLTP).