



17<sup>th</sup> October, 2008

Dr Ken Henry  
Chair, Australia's Future Tax System Review Panel  
The Treasury  
Langton Crescent  
PARKES ACT 2600

Dear Dr Henry,

The Cycling Promotion Fund (CPF) is pleased to provide its submission to the *Australia's Future Tax System Review Panel* ("the Review Panel") to contribute to the Australian Government's review of Australia's taxation and transfer system.

The CPF is a non-profit organisation which aims to ensure that cycling is a safe, popular and convenient activity for people of all ages. CPF membership is open to any business, which imports, manufactures or wholesales bicycle products, and/or provides services to the point of sale sector of the bicycle industry and supports our mission. The CPF undertakes a range of activities to promote cycling as an active transport solution that can help address climate change, traffic congestion, and public health.

Our submission is framed around the questions suggested by the Review Panel and is focused on aspects of the tax system that affect transport related usage and investment decisions and related social and environmental impacts. It highlights that the tax system remains hostile to important social well-being and environmental policy objectives and is out of step with community expectations.

Certain aspects of the current tax system specifically disadvantage bicycle use and other forms of active and sustainable transport. This is unacceptable in the current climate and should be addressed through the simplifying reforms outlined herein. In addition, more fundamental transport-related tax reform should be undertaken to address climate change, congestion and public health.

The CPF would like to acknowledge the assistance provided by Frontier Economics in the preparation of this submission.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. Speidel', is written over a light blue horizontal line.

Rosemarie Speidel  
Program Director  
Cycling Promotion Fund



## TRANSPORT-RELATED CHALLENGES FACING AUSTRALIA

*What major challenges facing Australia need to be addressed through the tax-transfer system?*

Transport usage and investment decisions are closely related with a number of increasingly critical issues facing Australia, including climate change, congestion, public health and obesity, and air and noise pollution. These problems pose a significant cost on the Australian community:

- *Climate change:* in 2006 transport contributed 79.1 Mt CO<sub>2</sub>e or 13.7 per cent of Australia's net emissions. Emissions from the transport sector were 27.4 per cent higher in 2006 than in 1990 (Commonwealth of Australia 2008). At a carbon price ranging from \$25 - \$50 per tonne CO<sub>2</sub>e, this is equivalent to a cost of approximately \$2 - \$4 billion per annum. The Australian Government Department of Climate Change (2008) has recently documented the potential impacts and costs of climate change.
- *Traffic congestion:* according to the Bureau of Transport and Regional Economics (2007), congestion costs in Australia's major cities are currently estimated at \$9.4 billion annually and this cost is expected to rise to over \$20 billion by 2020.
- *Obesity:* The Australian Institute of Health and Welfare (2006) found that around half of the Australian population lack the appropriate level of physical activity, a major cause of obesity. Access Economics (2008) estimated the economic cost of obesity at approximately \$58.2 billion annually.
- *Air and noise pollution:* Non-greenhouse emissions from motor vehicles also produce a range of pollutants that produce harmful effects human health and the environment. Laird *et al* (2001) estimate the costs of health damage from transport-related air and noise pollution at more than \$3 billion per annum. Hamilton and Denniss (2000) estimated the annual costs of urban air pollution (due predominantly to transportation) at over \$13 billion.

While these problems are critically important and must be addressed, the question of whether it is appropriate to address these issues in the tax system is more complex. At a minimum, the design of the tax system should not distort decisions in a manner that exacerbates these problems.

More fundamentally, international and Australian experience has also shown that tax system reform and other market-based instruments can be used to address such externalities and encourage more socially optimal outcomes, including through the direct encouragement of sustainable and active transport alternatives (for examples, see Potter *et al* 2005; Potter *et al* 2006; Commission of European Communities 1998; HM Treasury 2002; The Australia Institute 2001).

While such tax reforms have an important role to play, they must also be combined with direct government funding of important public transport and cycling infrastructure, as well as effective regulation and planning. The key public policy issue becomes one of designing an appropriate set of mechanisms that address these problems in a direct, proportionate and cost-effective manner.

## **KEY FEATURES OF THE TAX SYSTEM IN ADDRESSING THESE TRANSPORT-RELATED CHALLENGES**

*What features should the system have in order to respond to these challenges?*

In considering the reform options, some of the features or criteria that should be considered, include: economic efficiency (including minimising distortions and compliance / administrative costs); consistency; simplicity and transparency; revenue impacts; equity; and distribution effects.

In relation to efficiency, the tax system should not distort efficient investment in, and use of, alternative forms of transportation. Any elements of the current tax system that arbitrarily favour one mode of transportation over another will result in inefficient allocation of resources.

These distortions should be identified and removed. Furthermore, the CPF is particularly concerned that some of the distorting incentives associated with the treatment of motor vehicles under current system also exacerbate un-priced third-party effects such as greenhouse gas emissions and congestion, resulting in even greater levels of inefficiency.

More generally, the Review Panel should ensure that their broader recommendations for tax reform do not produce any unintended negative consequences in relation to the transport-related challenges facing Australia.

## **PROBLEMS WITH THE CURRENT SYSTEM**

*What are the problems with the current system?*

### **Fringe Benefits Tax and the treatment of motor vehicles**

Fringe Benefits Tax (FBT) is an important part of the tax system in Australia. If designed effectively, it should help ensure that recipients are indifferent between employer provided fringe benefits and other sources of income. The current system of FBT in Australia has been the subject of much debate and criticism in relation to economic inefficiencies, inequities and the increasing compliance burden (see Institute of Chartered Accountants in Australia (ICAA) (2006) for a more detailed discussion).

However, as the ICAA (2006) stated, “while there is broad agreement outside government that substantial reform to FBT is needed, there is a real inertia against such change within government”. As such, the CPF is encouraged by the fact that the Australian Government has directed the Review Panel to examine FBT and make recommendations for longer-term reform.

With our interest in transport, the focus of the following discussion relates to the treatment of motor vehicles, which are the most common type of fringe benefit, the source of approximately half of all FBT revenue (ICAA, 2006), and arguably the source of the most significant problems.

These problems stem from the statutory formula method, which is overwhelmingly the more frequently used of the two methods for calculating FBT on cars, collecting approximately 96 per cent of all FBT on motor vehicles (ICAA, 2006). Despite its administrative simplicity, there are two distinct sources of inefficiencies in the current statutory formula method:

1. its general concessionary nature which favours motor vehicles over other forms of transport; and
2. the distorting incentives provided by the distance based thresholds used in the current formula.

### ***Problem 1: Concessions for motor vehicles***

The statutory formula method was introduced primarily to eliminate the need for recipients of motor vehicle related fringe benefits to log all travel in order to determine the proportion of private versus business related travel (as required under the alternative operating cost method). However, according to the ICAA (2006) the statutory formula method was also adopted “as an indirect method of providing support for the domestic motor vehicle construction sector, which in 1986 (when FBT was introduced) was attracting substantial government support to improve its economic viability”.

Supporting analysis by the ICAA (2006) based on ATO and Treasury data indicates that, by using the statutory formula method, approximately 43.1 per cent of potential FBT on cars was foregone in 2003-04. This translates to an annual subsidy of more than \$1 billion, with both the total revenue and percentage foregone increasing over time. The basic reason is that the statutory percentages are too low and do not adequately reflect the real proportions of private versus business travel.

This \$1 billion subsidy for motor vehicles results in allocative inefficiencies in transport related investment decisions involving cars and alternative options such as bicycles and public transport, which do not receive any FBT concessions. Inefficient over-consumption of cars leads to inefficient car use and inefficient allocation of car inputs such as fuel — which also exacerbates problems with un-priced third-party externalities such as congestion and greenhouse gas emissions, respectively.

As such, the CPF encourages the Review Panel to address the distorting and environmentally damaging nature of the current statutory method by removing these concessions. Our view is supported by a diverse range of stakeholders including the ICAA (2006) which points out that, as a result of the changing nature of the domestic motor vehicle industry (with more Australian made cars being exported, and increased car imports as a result of tariff reductions), more than half of the FBT concessions are benefiting overseas importers, rather than the domestic industry, and this proportion is increasing over time.

FBT concessions are therefore now a very indirect and poorly targeted means of achieving this dubious policy objective. While the CPF does not support subsidies to the car manufacturing industry in Australia, it is worth noting that replacing the current method with a direct and targeted subsidy for the domestic industry could save approximately \$500 million per year (ICAA 2006).

### ***Problem 2: The distance based thresholds***

In addition to the overall concessions that favour motor vehicles over other forms of transport, there is an incentive for cars to be driven greater distances in order to obtain significant further tax reductions — resulting in further inefficiencies in the allocation of car inputs such as fuel and in relation to transport related decisions involving cars and alternative options such as bicycles and public transport. Increased car use also exacerbates the problems with un-priced third-party externalities such as congestion and greenhouse gas emissions as outlined above.

The CPF encourages the Review Panel to address the distorting and environmentally damaging nature of the current statutory method and outlines a simple alternative statutory method for your consideration as part of the broader review of FBT.

**Box 1: Demonstrating the problem with the current thresholds in the statutory formula method**

- Using the statutory formula method, FBT payable on a car is based on the ‘taxable value’ of the car multiplied by the FBT rate (currently 46.5%) (ATO, 2008). However the ‘taxable value’ of the car is based on its actual base value multiplied by the ‘statutory percentage’. This ‘statutory percentage’ declines in discrete amounts at certain thresholds (outlined in

Table 1 and Figure 1 below), providing significant savings in FBT once each threshold is reached.

For example, assume that a car valued at \$35,000 is used privately, or available for private use for the full tax year, with no after tax employee contributions. In this case, the FBT payable decreases from \$8,736 to \$6,720 as soon as the distance driven exceeds 15,000 km, representing a total saving of over \$2,000, or a 23 per cent discount.

Similarly, the FBT payable on the same car decreases from \$6,720 to \$3,696 as soon as the distance driven exceeds 25,000 km, representing a total saving of over \$3,000, or an additional 45 per cent discount. This threshold provides the largest percentage discount and is also likely to provide an incentive to a large number of recipients, considering that the average annual vehicle travel is approximately 15,500 – 16,000 km (BTCE 1996).

Annual distance travelled (km)	Statutory percentage	FBT payable on car valued at \$35,000	FBT payable on car valued at \$70,000
Less than 15,000	26%	\$8,736	\$17,473
15,000-24,999	20%	\$6,720	\$13,440
25,000-40,000	11%	\$3,696	\$7,392
40,000+	7%	\$2,352	\$4,704

Table 1: FBT payable under the statutory formula method

Source: ATO, 2008

It is acknowledged that these thresholds will not affect the driving decisions of all recipients of FBT concessions on cars. However, the current structure is widely recognised as providing a strong incentive for many drivers and is highly distorting as they approach each threshold.

By simply trading off fuel costs for additional FBT concessions, it is clear that the perverse incentives are significant. For example, if fuel costs were in the order of \$150 for an additional 1,000 kilometres, then it would not be surprising that savings in the order of several thousand dollars are sufficient to prompt unnecessary increases in vehicle kilometres and associated greenhouse gas emissions.

Anecdotal evidence suggests that many recipients do indeed make long unnecessary trips to reach the next threshold, particularly during the period approaching the end of the FBT year, which is 31<sup>st</sup> March.

For example, Taxpayers Australia (2008) states:

*You cannot blame taxpayers who have employer-provided vehicles for clocking up additional kilometers to take advantage of these outdated rules. The savings far outweigh the additional cost, resulting in what some observers call the last month of the FBT year ... "March Madness".*

The Ralph Report (1999) found that:

*Because the taxable value of the benefit under the current formula actually falls by substantial steps as total kilometres rise, there can be a significant incentive to travel unnecessary kilometres toward the end of the fringe benefits year. In consultations, mention was made of the 'March Corporate Rally', a term used to describe the excessive car travel that takes place around the end of March each year.*

In a statement to the Australian Senate, Kerry Nettle (2003), an Australian Greens Senator for NSW, provided an example of how fringe benefits tax encourages further driving, using the example of the Fairfield Council in NSW:

*Fairfield Council offers its staff cars as a part of their salary package. It requires its staff to travel 25,000 kilometres each year in order to reach a lower tax rate. So Fairfield Council sets out the monthly mileage that a staff member has to travel to reach the annual 25,000 kilometre target. It works out at about 2,000 kilometres a month, or 67 kilometres each and every day, which is the equivalent of travelling from Parliament House to Queanbeyan and back three times a day.*

Other reports and evidence referring to the 'March Madness' induced by the statutory formula method include several submissions to the recent Australian Government reviews including the Garnaut Climate Change Review (2008), the Standing Committee on Rural and Regional Affairs and Transport (2007) *Australia's Future Oil Supply and Alternative Transport Fuels*, and the House Standing Committee on Environment and Heritage (HSCEH) *Inquiry on Sustainable Cities* (2005). The issue with the thresholds has also been raised in reports by The Australia Institute (2001), and the Institute of Chartered Accountants (2006).

The HSCEH (2005) report found that "salary sacrificing for a car means that the more kilometres a person travels in an FBT year, the less tax is assessed" and that this represents "one of the impediments to reducing car dependency on Australia roads".

*The (HSCEH) committee recommends that the Australian Government review the current FBT concessions for car use with a view to removing incentives for greater car use and extending incentives to other modes of transport.*

A statistical analysis of a sample of FBT claims could be used to quantitatively estimate the distorting impact of the thresholds. The resultant distribution is expected to find a disproportionate number of recipients with reported usage just above each threshold compared to just below each threshold, whereas a non-distorting tax would be expected to display a smoother distribution.

More importantly, the CPF believe that the current system is clearly flawed and the statutory formula method needs to be amended.

## Other transport-related problems with the existing tax system

In addition to the FBT concessions on motor vehicles, there are a number of other widely documented problems with the tax system, including:

- tax free fringe benefits for employer-provided car parking;
- poorly targeted differential treatment of import duty on four wheel drive vehicles, which are now largely used in urban areas (see Raimond 2007); and
- state-based fuel subsidies.

None of these subsidies apply to public transport or cycling. They are distorting, add complexity to the tax system and should be reformed.

## POTENTIAL REFORM OPTIONS

*What reforms do we need to address these problems?*

### FBT reform

Our preference would be to maintain a simple FBT system with low compliance costs as provided by the statutory formula method. The overarching goal for reform of the statutory formula method should be to ensure that the impact is equivalent to the outcomes that would be achieved under the operating costs method, where FBT is accrued for all private use.

A simple and effective solution that does not add any significant complexity to the tax system would be to:

- change the statutory percentages to remove the concessions; and
- replace the discrete thresholds with a formula that provided a continuous linear increase in the FBT concession, in much the same way that marginal income tax rates operates.

We first recommend a review and detailed analysis of private versus business vehicle usage to ensure that distance travelled remains the most appropriate basis for the method. The appropriate (non-distorting) statutory percentages could then be determined and updated as required. This recommendation is similar to the ‘Ralph’ Review of Business Taxation (1999), which recommended a “schedular approach” based on published surveys conducted by motoring organisations of aggregate vehicle running costs.

As part of this process, the thresholds should be replaced by moving from the current discontinuous approach demonstrated in Figure 1 to some form of continuous approach demonstrated in Figure 2.

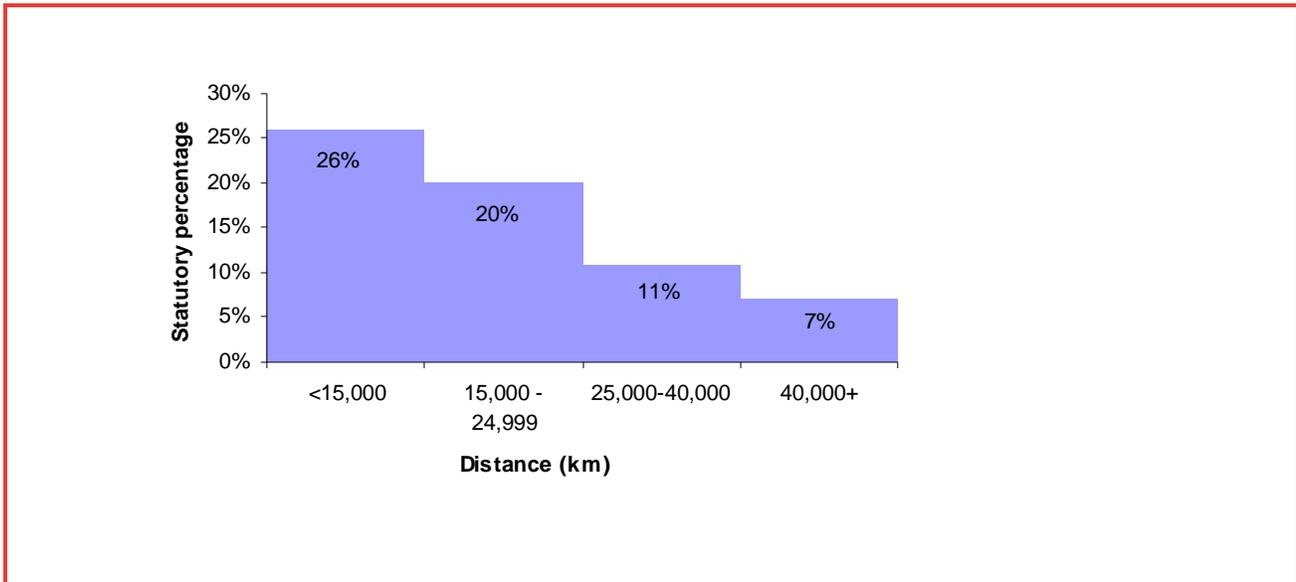


Figure 1: Current statutory formula method

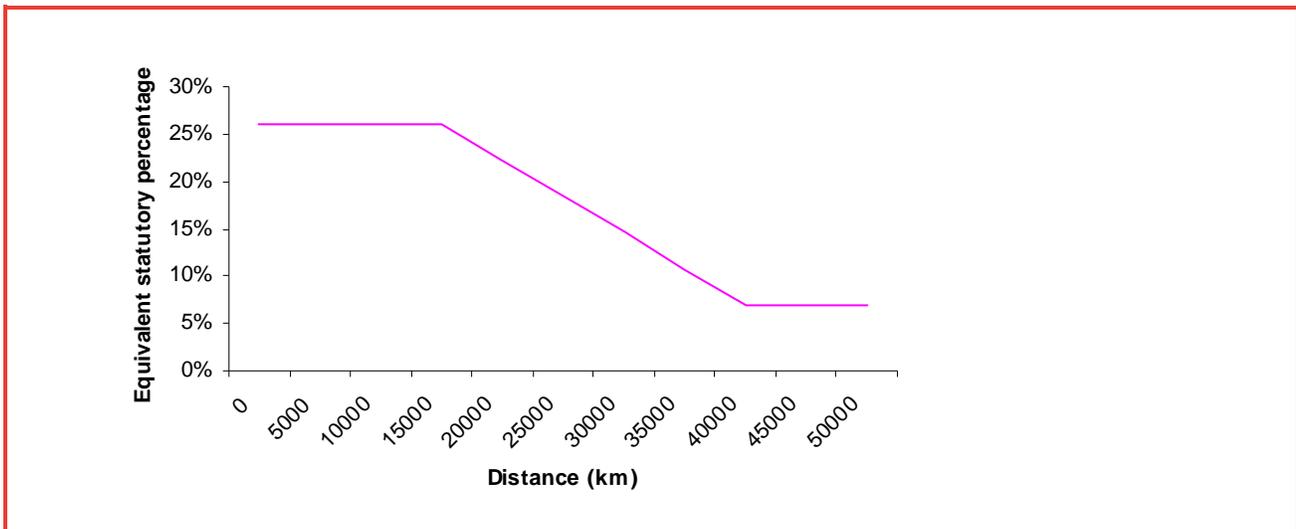


Figure 2: Conceptual representation of the potential revision of the statutory formula

Figure 2 shows that there are no discontinuities in the statutory percentage so it would effectively remove the perverse incentive at each of the current thresholds.

In Figure 2, the statutory percentage for any recipient would equal:

- 26%, if total kilometres was less than 15,000 km;
- $26\% - (19\% \times (\text{actual km} - 15,000)/25,000)$ , if total kilometres was between 15,000 and 40,000 km; and
- 7%, if total kilometres was more than 40,000km

To adjust the statutory percentages to remove the overall tax concession provided to cars the formula could be generalised to:

- X%, between 0 and A km;
- $X\% - (X-Y) \cdot (KM-A)/(B-A)$ , between A and B km; and
- Y%, over B km,

Where:

- X is the starting or highest statutory percentage
- Y is the final or lowest statutory percentage
- A is the initial threshold distance
- B is the final threshold distance

From an administrative perspective, this approach would simply require the actual number of kilometres driven in each car to be input into the formula (above). We do not believe that this adds any additional complexity to the current method, and is certainly less burdensome than reverting to individual log books under the operating cost method. As such, we believe that this approach would address the concerns outlined by Taxpayers Australia (2008):

*We do not advocate getting rid of the simple methodology such as the statutory formula for valuing cars. What we would like to see however is for the formula to be reviewed as it encourages the wasteful use of employer-provided cars, which in turn adds unnecessarily to our greenhouse emissions. What we do advocate is a replacement formula that is administratively simple to implement as there are already more than enough FBT compliance issues facing employers.*

Moreover, the formula could be adjusted (by choice of A, B, X and Y in the generalised form) to eliminate the current overall subsidy for company cars as well as effectively eliminating the incentive for March Madness, while still achieving the policy objective of recognising business vehicle use in a simple and cost-effective manner. In fact, any evidence-based continuous relationship could be developed to help ensure that statutory formula method has the same effect as the application of the operating cost method.

## **THE NEED FOR MORE FUNDAMENTAL REFORM**

The tenor of this submission has been to highlight the current perverse incentives embodied within the existing tax system, and the adverse consequences for important policy objectives relating to public health, congestion and environmental outcomes. However, we believe that a more fundamental review of the role and function of the tax system is required to address these challenges.

Internationally, a number of countries have commenced a range of reforms to shift the focus of the tax system away from general revenue raising to use taxation as a tool to help achieve important economic, social and environmental policy objectives (Potter et al 2006; Commission of European Communities 1998; HM Treasury 2002). Design of such reforms should be guided by the desirable features or criteria outlined above.

### ***Vehicle taxes and charges***

Vehicle taxes and charges should be reconsidered to ensure that these charges are fully cost reflective (including road maintenance and upgrade costs, road safety costs) and provide an incentive to reduce emissions and other related externalities. For instance, taxes or registration fees could be based on the fuel efficiency of the vehicle and redesigned to better reflect the disproportionate impact of heavy vehicles on the costs of maintaining and upgrading the road system.

The UK Government has already reformed car vehicle excise duty (VED) to relate it to carbon dioxide emissions and provide incentives for more efficient cars. They also reformed truck VED to provide incentives to use cleaner and less damaging lorries, based on an independent environmental evaluation of the impact of different trucks (HM Treasury 2002).

In June 2004, France announced the reform of their car registration tax into a 'feebate' scheme. Under this, cars that emit over 180g/km of CO<sub>2</sub> or diesels without a particulates filter will face a surcharge of €1,500 - €3,500, whereas cars that emit under 140g/km of CO<sub>2</sub> and diesels with particulate filters will receive a rebate of €200 to €700. Cars emitting between 140 and 180g/km of CO<sub>2</sub> will be liable to neither a surcharge nor rebate (Potter *et al* 2005).

### ***Climate change***

The CPF acknowledge and emphasise the importance of the Australian Government's Carbon Pollution Reduction Scheme (CPRS) as a vital tool to reduce greenhouse gas emissions and an important example of a market based approach to address an environmental policy objective. However, it is essential that the final CPRS design provides a strong signal for greenhouse gas emission abatement in the transport sector.

### ***Congestion charges***

The merits of congestion charges in major urban areas should be investigated further. This includes both area-based systems such as those used in Singapore and London and variable priced tollways, common in North America. Car parking fees can also be used as a tool to address congestion. However, the CPF believe that congestion charges need to be combined with increased investment in public transport and cycling related infrastructure in order to provide people with safe and convenient transport alternatives.

### ***Proactive support for sustainable and active transport solutions***

Although this review may be largely motivated by tax simplification objectives, the taxation system also provides the means to more actively promote desirable policy objectives. We note and endorse the policy initiatives adopted in other countries to promote bicycle use and other forms of sustainable and active transportation, recognising both the severity of the transport problems and the powerful incentive that taxes can have on behaviour. For example, in countries such as the USA, UK and Ireland where commuting to and from work is generally not tax deductible (such as Australia), a number of proactive approaches have been developed.

- As part of the UK Government's Green Transport Plan, there is a specific tax exemption that allows employers to provide bicycles and safety equipment to employees through untaxed interest-free loans.  
US Government policy reflects the research conclusion that "direct financial incentives or subsidies are a key element of successful programs" to reduce single-occupancy car use to work. Direct incentives have been in place since the 1980's focusing on car-pooling and public transport.
- As part of the recent package to address the financial crises in the USA (HR1244), fringe benefits tax relief has been extended to bicycle commuters. The \$20 a month tax relief per bicycle commuting employee is to cover the cost of any employer reimbursement for reasonable expenses incurred, provided the employee "regularly uses the bicycle for a substantial portion of the travel between the employee's residence and place of employment".
- Ireland has a successful system that enables public transport tickets to be purchased by the employer and passed onto the employee in a tax-effective manner (Potter and Lane (2005).

In an Australian context, these schemes are equivalent to tax reforms that would allow bicycles and related accessories (helmets, lights and carry racks) to be provided by employers or purchased by employees using gross income (i.e. salary sacrificed) without incurring Fringe Benefits Tax. Considering the severity the public health and obesity, congestion and climate change challenges facing Australia and the effectiveness of commuter cycling in addressing these issues.

CPF encourage the Review Panel to develop and recommend such a scheme in Australia. Such FBT concessions could either be extended to public transport and other work-related benefits that contribute to improved public health outcomes or part of an overall package aimed at preventative health.

We believe that the case for such changes is increased further if the distortions favouring motor vehicles discussed above are not fully removed.

The most appropriate and effective design of such concessions requires further consideration in the context of FBT reforms. In general, CPF believe that there is good evidence to suggest that employees and employers would respond positively to such concessions for bicycles, particularly when they are implemented in conjunction with other reforms such as further promotion of cycling as a legitimate, healthy, enjoyable, and affordable transport option and investment in public cycling-related infrastructure (see Box 2).

As a specific example, we understand that the Public Transport Authority in Western Australia recently abandoned plans to purchase bicycles for their train drivers to travel to and from work solely because this expenditure would have been subject to FBT. To ensure that such concessions are well targeted, we believe that they should be limited to certain dollar amounts per employee each year (approximately \$1,500) and subject to the condition that the bicycle is primarily used for transport to and from the workplace. To reduce the compliance costs, an overall annual threshold could be introduced for FBT payable on a range of expenses that produce health benefits including bicycles.

Overall, we believe that the minor revenue impacts of such reforms would be more than offset by the resultant improvements in public health, and reductions in congestion and greenhouse gas emissions (see CPF 2008 on the *Economic benefits of cycling for Australia*)<sup>1</sup>.

### **Box 2: The effectiveness of incentives in changing transport behaviour**

In New Zealand, Beck (2007) found that, “through travel plan programs in New Zealand and overseas, the provision of subsidies and incentives are the most effective initiatives that employers can implement to encourage employees to reduce their avoidable car trips. Both the Wellington and Auckland regions’ workplace travel plan data offers evidence that subsidised transport is one of the top two measures that workplaces can implement to encourage their employees to reduce car trips.

Fringe Benefit Tax (FBT) currently applies on these types of incentives and is payable by employers who wish to offer them through their travel plan implementation measures. Businesses however are more likely to implement some of these sustainable transport measures if they are not penalised for doing so through the requirement of fringe benefit tax payments. Achieving behaviour change such as employees leaving their cars at home more often and using more sustainable modes occurs over time. The ongoing implementation of subsidies and incentive measures is essential for travel planning in New Zealand to achieve both individual employer objectives relating to sustainability as well as regional and national environment, social, health, sustainable transport and economic objectives.”

<sup>1</sup> Also see Potter et al (2001) for an assessment of the tax cost and cost-effectiveness of a range of relevant reform proposals.

## OVERALL POSITIONS

- CPF supports the review of the tax and transfer system including its aim of ensuring that Australia has an efficient and equitable system capable of addressing the key economic, social and environmental challenges facing Australia into the future.
- In supporting efficient transport decisions, the CPF is encouraged by the Australian Government's renewed interest in reforming FBT and strongly supports the reform of the statutory formula method for motor vehicle concessions to remove both:
  - poorly targeted existing concessions that favour motor vehicles over other forms of transport; and
  - the additional distorting effects of the discontinuous thresholds.
- CPF encourages the Review Panel to recommend more fundamental transport related reforms to better align the tax system with social and environmental policy objectives, including new and innovative approaches that proactively encourage cycling and other forms of active and low-emissions transportation.
- CPF encourages the Review Panel to ensure that their recommendations do not have perverse or unintended negative consequences in relation to climate change, congestion and public health.

The CPF would be happy to discuss this submission with the Review Panel in more detail and to be involved in further consultation throughout the review process in relation to the matters raised in this submission.

Your sincerely,



Rosemarie Speidel  
Program Director  
Cycling Promotion Fund

## REFERENCES

- Access Economics, 2008 *The Growing Cost of Obesity in 2008*, Access Economics, Canberra.  
<http://www.accesseconomics.com.au/publicationsreports/showreport.php?id=172&searchfor=2008&searchby=year>
- Australia Institute (2001) *Taxation and the Environment*. Discussion Paper 44, November 2001.
- Australian Institute of Health and Welfare, 2006 *Australia's Health 2006*, Australian Government, Canberra.  
<http://www.aihw.gov.au/publications/aus/ah06/ah06.pdf>
- Australian Taxation Office (2008) *Fringe benefits tax (FBT) - A guide for employers*.  
[http://www.ato.gov.au/businesses/content.asp?doc=/content/fbt\\_guide.htm](http://www.ato.gov.au/businesses/content.asp?doc=/content/fbt_guide.htm)
- Beck (2007) *Tax Reform – Removing Barriers to Sustainable Transport*. Greater Wellington Regional Council.
- Bureau of Transport and Regional Economics, 2007 *Estimating urban traffic and congestion cost trends for Australian cities*, Working Paper 71, Commonwealth of Australia, Canberra.
- Commission of European Communities (1998) *Fair Payment for Infrastructure Use*. White Paper, COM (98) 466 (Brussels: CEC)
- Commonwealth of Australia (2008) *Climate change – potential impacts and costs*.  
<http://www.climatechange.gov.au/impacts/publications/fs-national.html>
- Cycling Promotion Fund (CPF) (2008) *Economic benefits of cycling for Australia*
- Department of Climate Change (2008) *Transport Sector Greenhouse Gas Emissions Projections 2007*, Commonwealth of Australia, Canberra. <http://www.greenhouse.gov.au/projections/pubs/transport2007.pdf>
- Garnaut Climate Change Review (2008) Public submissions:  
<http://www.garnautreview.org.au/CA25734E0016A131/pages/submissions>
- Hamilton and Denniss (2000) *Tracking Well-being in Australia: The Genuine Progress Indicator 2000*, Discussion Paper No. 35, The Australia Institute, Canberra
- HM Treasury (2002) *Tax and the environment: using economic instruments*. November 2002.
- House Standing Committee on Environment and Heritage (HSCEH) (2005) *Inquiry on Sustainable Cities*. House of Representatives, The Parliament of the Commonwealth of Australia, Canberra (Chapter 5).  
<http://www.aph.gov.au/House/committee/environ/cities/report.htm>
- Institute of Chartered Accountants in Australia (ICAA) (2006) *Fringe benefit tax design: decision time*, Sydney March 2006
- Laird, P., Newman, P., Bachels, M. and Kenworthy, J. (2001), *Back on Track: Rethinking transport policy in Australia and New Zealand*, UNSW Press.
- Nettle (2003) *Taxation: Fringe Benefits Tax*, 18 March 2003.
- Potter, S, Enoch, M, Rye, M, Black, C, Ubbels, B (2006) *Tax Treatment of Employer Commuting Support: An International Review*. Transport Reviews, Vol. 26, No. 2, 221–237, March 2006.  
<http://design.open.ac.uk/potter/documents/TTRV118421.pdf>

Potter, S, Parkhurst, G and Lane, P (2005) *European perspectives on a new fiscal framework for transport*.

Potter, S., Enoch, M., and Fergusson, M. (2001): *Fuel taxes and beyond: UK transport and climate change*, London, World Wide Fund and Transport 2000.

Raimond (2007) *Four Wheel Drives in Urban Areas: Who uses them and why?* Transport and Population Data Centre, NSW Dept of Infrastructure, Planning and Natural Resources.

Review of Business Taxes (1999) *A Tax System Redesigned*, July, Commonwealth of Australia.

Standing Committee on Rural and Regional Affairs and Transport (2007) *Australia's Future Oil Supply and Alternative Transport Fuels*

Taxpayers Australia (2008) *Editorial - Let's end the FBT 'March Madness'*, Monday 18 February, 2008 by Tony Greco CEO.