



Mr Adam Carlon, NEPC Executive Officer
National Environment Protection Council
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

Via email; nepc@environment.gov.au

**SUBMISSION ON PROPOSED VARIATION TO THE NATIONAL ENVIRONMENT PROTECTION
(AMBIENT AIR QUALITY) MEASURE**

Dear Mr Carlon

Gas Energy Australia (GEA) welcomes the opportunity to respond to the National Environment Protection Council's (NEPC's) *Proposed variation to the National Environment Protection (Ambient Air Quality) measure standards for ozone, nitrogen dioxide and sulfur dioxide* and associated Impact Statement.

By way of background, GEA is the national peak body, which represents the bulk of the downstream alternative gaseous fuels industry, which covers Liquefied Petroleum Gas (LPG), Liquefied Natural Gas (LNG) and Compressed Natural Gas (CNG). The industry comprises major companies and small to medium businesses in the gaseous fuels supply chain including producers, refiners, distributors, transporters, retailers, vehicle manufacturers, equipment manufacturers and suppliers, installers, educators and consultants.

GEA commends the NEPC for conducting a comprehensive review of the National Environment Protection (Ambient Air Quality) Measure standards for ozone (O₃), nitrogen dioxide (NO₂) and sulfur dioxide (SO₂). GEA supports the NEPC's proposed variation to these standards to reduce harm to humans from these gases and notes the finding in the Impact Statement that "current policy interventions are not limiting emissions and concentrations in line with policy objectives".

With regard to the Impact Statement's cost benefit analysis, GEA considers a higher initial benefit to cost ratio could be achieved by focussing on early actions to combat the release of these gases from sources in close proximity to where people live and work. For example, the Federal Government's 2012 Review of Emission Standards (Euro VI) for Heavy Vehicles Discussion Paper concluded that "air pollution from motor vehicles is particularly harmful for human health as the general population has a higher level of exposure to motor vehicle emissions than other pollutant sources"¹.

Overseas and in Australia, diesel exhaust, which is a major source of NO₂ and SO₂, as well as particulate matter (PM), has been identified as a significant threat to human health and a priority air quality issue to be addressed by policymakers.

In relation to the abatement measures costed in the Impact Statement, GEA notes that measure 6, which involves implementing emission standards for non-road diesel engines used in agriculture, construction, mining, industry, marine transport and small-scale power generation, would reduce diesel exhaust that often occurs in close proximity to those working in these industries.

¹ Federal Department of Infrastructure and Transport, October 2012, Discussion Paper on the Review of Emission Standards (Euro Vi) for Heavy Vehicles.

GEA considers the greater use of gaseous fuels in both transport and stationary energy applications would not only deliver a cleaner environment, with significantly reduced pollutants and emissions including improved air quality, but do it in a way that minimises abatement costs. For example, the shipping industry is increasingly turning to LNG fuel switching as the most cost effective means of meeting the International Maritime Organisation's regulations to reduce the sulfur content of marine fuel that come into effect in 2020.

Australia has vast supplies of affordable LPG and natural gas which both have a low carbon and noxious chemical content. The use of LPG and natural gas fuels offer significant advantages particularly over the use of diesel fuels, with CNG and LNG producing 30 per cent less CO₂, 75 per cent less NO₂, 90 per cent fewer PMs and 99 per cent less SO₂.

GEA also supports the Impact Statement's conclusion that "consideration should be given to alternative abatements that may achieve a larger impact across whole populations such as those associated with motor vehicles and transport options".

In light of the NEPC's review and proposed variations, GEA considers early actions should be focussed on areas such as those covered by abatement measure 6 where the greatest benefits compared to costs can be achieved. And it is in these areas that fuel switching should be considered as an affordable way to improve Australia's air quality and reduce significant threats to human health.

Finally, GEA looks forward to working with the NEPC and the Commonwealth Department of the Environment and Energy to realise the many environmental and health benefits that would flow from greater use of gaseous fuels.

For your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to read "John Griffiths", with a long horizontal line extending to the right.

John Griffiths
Chief Executive Officer
Gas Energy Australia