

7 March 2018

Fuel Policy Section
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601
Via email: fuel.policy@environment.gov.au

SUBMISSION ON BETTER FUELS CLEANER AIR REGULATORY IMPACT STATEMENT

Dear Sir or Madam

I am writing to you on behalf of the members and associates of Gas Energy Australia (GEA) in response to the Better Fuel for Cleaner Air Draft Regulation Impact Statement (RIS) of January 2018.

GEA questions some of the reference standards used in the document and also the reasoning behind some of the minor changes in the autogas standard, which on the surface appear to offer no discernable improvement in fuel quality but would make industry challenges to government testing notices more expensive. With regard to the reference standards in the RIS, GEA considers:

- there is an error in table B4 - volatile residues C5 and the higher proposed method should be ASTM D2163-14e1, not ASTM D1263-14e1 as listed; and
- there is an error for residue on evaporation – the current method is JLPGA-S-03 not JLPGS-S-03.

In relation to the table which outlines different testing methods to those currently used, GEA notes that these changes would be to the methods quoted in the fuels standard which are the referee methods. In cases of dispute, laboratories could continue to use current methods on the understanding that they would give comparable results to the methods quoted in the fuel standard which the government would use for its legal compliance testing. Subsequently, if there was a dispute, industry would need to have samples retested to the fuel standard reference method.

Specifically, in relation to EN 15471 which determines residue content by mass with similar repeatability and reproducibility to the JLPGA-S-03 method, GEA notes the current JLPGA-S-03 test equipment is used by all industry laboratories. Consequently, changing the test method would require industry to change equipment which would be an imposition on industry for no real benefit.

GEA suggests that there could be merit in the proposals for method ASTM D2163 -14e1, but these should be considered when the fuel standards are revised.

Finally, GEA appreciates the opportunity to provide feedback on the draft RIS and looks forward to continuing to work with your Department and Marsden Jacob Associates during the review process.

Yours sincerely



John Griffiths
Chief Executive Officer