



21 March 2014

Mr Paul Retter
Chief Executive Officer
National Transport Commission
Level 15,
628 Bourke Street,
Melbourne 3000

Via National Transport Commission website portal

See Distribution

GAS ENERGY AUSTRALIA SUBMISSION

NATIONAL TRANSPORT COMMISSION

MASS LIMITS FOR 2-AXLE BUSES – DISCUSSION PAPER FEBRUARY 2014

Dear Paul,

Gas Energy Australia appreciates the opportunity to make a submission to the National Transport Commission (NTC) on Mass Limits for 2-Axle Buses – Discussion Paper February 2014 (Discussion Paper).

Gas Energy Australia is the national peak body which represents the bulk of the downstream 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 refiners, fuel marketers, equipment manufacturers, vehicle converters, and the providers of services to the industry.

Gas Energy Australia supports the Discussion Paper's option to increase the mass limits of buses with two single axles from 16 tonnes to 18 tonnes. In addition, Gas Energy Australia suggest that these mass limits be further increased by 1,000kg to accommodate the additional weight associated with the use of gaseous fuel technologies, in particular CNG. Gas Energy Australia notes that the higher full limit as a result of adding this 1,000kg mass limit would only ever be realised operationally when a bus had a full fuel and passenger load.

Gas Energy Australia also notes that accommodating the additional weight associated with the use of gaseous fuel technologies and encouraging increased take-up of gas-powered buses would offer a number of benefits to the community compared to diesel-powered buses which are discussed below.

1. Reducing emissions

Gas Energy Australia refers to the recently released *Draft National Transport Commission Strategic Plan 2014-15 to 2016-17*, which includes in the target section of the draft “*productivity projects undertaken by the NTC lead to improved productivity for industry, and reduced fuel use and vehicle emissions*”.

Gas Energy Australia suggest that the Mass limits for 2-axle buses project is one which would not only deliver improved productivity for industry, but also reduce imported fuel use and significantly contribute to reduced vehicle emissions in the urban environment.

The Truck Buyers Guide published on the Department of Infrastructure and Regional Development website ¹ identifies the following benefits of gaseous fueled trucks compared to diesel fueled trucks.

- a. Cheaper fuel costs.
- b. Lower operating costs in the long term.
- c. Much lower particulate and visible pollution – which would improve city air quality.

2. Reducing imported fuel

Gas Energy Australia notes that the NRMA’s recently commissioned fuel security report pointed out that Australia’s combined dependency on crude and fuel imports for transport has grown from around 60% in 2000 to over 90% in 2014.² With buses providing a substantial contribution to public transport infrastructure in Australia, this provides a unique opportunity through policy to assist in fuel switching and enhance Australia’s liquid fuel security.

3. European Economic and Social Committee

Gas Energy Australia draws the NTC’s attention to the response of the European Economic and Social Committee (EESC) to the *Proposal for a Directive of the European Parliament and of the Council amending Directive 96/53/EC of 25 July 1996 laying down for certain road vehicles circulating within the Community, the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic*.³

Significantly, the EESC supported weight exemptions granted to electric or hybrid propulsion vehicles, both trucks and buses, and further that all green vehicles should be treated in the same way. The EESC recommended to grant the same exemption for other tractions and alternative fuels where the technical solutions imply extra weight that penalise the payload capacity, i.e. hydrogen, CNG and LNG (liquefied natural gas) vehicles.

¹ <http://www.truckbuyersguide.gov.au/interactive/files/DifferentFuelTypes.pdf>

² Australia’s Liquid Fuel Security Part 2 A report for NRMA Motoring & Services Prepared by John Blackburn AO February 2014

³ Official Journal of the European Union C 327/135(<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2013:327:0133:0136:EN:PDF>)

4. Recommendation

Gas Energy Australia supports the Discussion Paper's option that the mass limits of buses with two single axles should be increased from 16 tonnes to 18 tonnes and further that the NTC apply an additional 1,000kg allowance for gaseous fuelled vehicles to recognise environmental and fuel security benefits.

For your earliest consideration and advice.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mike Carmody', with a large loop at the start and a horizontal line underneath.

Mike Carmody
Director and Chief Executive Officer
Gas Energy Australia

Distribution: Gas Energy Australia CNG Industry Task Force

For information:

Gas Energy Australia State Representatives
Gas Energy Australia Secretariat