



12 April 2016

Fuel Quality Review

Marsden Jacob Associates
Level 3, 683 Burke Road
Camberwell, Victoria, 3124

Via email: fuelqualityreview@marsdenjacob.com.au

SUBMISSION ON REVIEW OF THE FUEL QUALITY STANDARDS ACT 2000

Dear Marsden Jacob Associates

I am writing to you on behalf of the members and associates of Gas Energy Australia (GEA) concerning your invitation for submissions on the Review of the Fuel Quality Standards Act 2000 draft report.

GEA welcomes the release of the draft report by Marsden Jacob Associates. Reducing pollution from the transport sector is pivotal for Australia to achieve its environmental and air quality objectives. Managing the quality of transport fuel is an important step in this process and the current review of the Act is an opportunity to identify improvements and ensure its currency.

GEA supports the draft report's recommendation to maintain the existing framework of the Act with government regulation of fuel quality at national level. We consider that the benefits of the Act estimated in the review and the ability to ensure regulatory consistency provide justification for this approach.

Regarding the proposed amendments to the Act listed in Box 6 of the draft report, GEA offers the specific comments below:

Amendment 1: Enhancing consumer protection – objects of the Act

GEA supports including the requirement that suppliers ensure fuel does not contain contaminants which affect engine operability in future determinations.

Amendment 3: S 13 approvals – emerging fuels

GEA supports allowing the Minister or a delegate to make bulk section S 13 approvals for emerging fuels to address rapid developments in fuel technology. However, the review should propose alternative arrangements for the Minister or a delegate to seek advice on approvals if the Fuel Standards Consultative Committee is disbanded.

Amendment 5: Strengthening penalties, compliance and reporting provisions

GEA supports the amendment proposed by the Department of Environment regarding Section 67A, and further recommends that the Department amend the confidentiality provisions in the Act to allow the Department to publish annual reports which include aggregated complaint and investigation data including fuel quality complaints received, investigated and the quantity found to be substantiated for all regulated

fuels, along with the learnings from these investigations. This openness and transparency will assist the fuel industry with identifying issues and developing solutions to maintain a high level of fuel quality.

Amendment 6: Coordinating fuel quality determinations and ADRs

GEA noted in a previous submission that alignment between the Fuel Quality Standards Act and Motor Vehicle Standards Act is important for achieving the full environmental benefits of improved engines and fuel. Hence, we support increased coordination between ADRs and fuel quality determinations where practical and consistent with this welcome the recently convened Ministerial Forum on Vehicle Emissions.

Recommendations

Gas Energy Australia:

- supports the draft report's recommendation to maintain the existing framework of the Act with government regulation of fuel quality at the national level; and
- recommends that the confidentiality provisions within the Act relating to fuel quality complaints be amended to allow the Department to publish aggregated reports on an annual basis.

GEA appreciates the opportunity to provide feedback on the draft paper and looks forward to continuing to work with Marsden Jacob Associates during the review process.

Yours sincerely

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

John Griffiths
Chief Executive Officer