

27 June 2016



Mr David Robertson

EnergySafety Division
Department of Commerce
303 Sevenoaks Street
Cannington, Western Australia 6107
Via email: energysafety@commerce.wa.gov.au

Discussion Paper: Review of gas compliance badge usage on fixed installations

Dear David,

I am writing to you on behalf of the members and associates of Gas Energy Australia concerning EnergySafety Western Australia's discussion paper: *Review of gas compliance badge usage on fixed installations*. Gas Energy Australia applauds EnergySafety for questioning the need for mandatory compliance badges at consumer gas installations, and supports the removal of this requirement from legislation.

By way of background, 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; refiners, fuel marketers, equipment manufacturers, LPG vehicle converters, consultants and other providers of services to the industry many of which have operations in Western Australia.

Gas Energy Australia contends that the electronic lodgment of the Notice of Completion (NOC) and the proposed availability of these records online makes the requirement for a compliance badge a duplication of effort. A move to an electronic format will ensure the NOC is completed correctly and legibly, and provides traceability and historical accuracy. Most importantly, it will greatly assist gas suppliers to meet their obligation of ensuring a property's gas installation is sound before an initial delivery is made.

Further to the development of online records, Gas Energy Australia recommends that;

- the NOC information should be open to all industry participants including agents/re-sellers across the state;
- the online system must be able to perform with low IT support and low connectivity often associated with remote communities; and
- the introduction of online records includes stakeholder education.

Gas Energy Australia notes from the discussion paper that Western Australia would be aligning with Victoria and South Australia on this issue, and would urge Western Australia to pursue national uniformity on this important red tape reduction strategy through the Gas Technical Regulators Committee.

Gas Energy Australia welcomes your consideration of this important issue and looks forward to continuing to work with EnergySafety in the future.

For your consideration.

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