



5 August 2016

Ms Rachael Hanna
Team Leader, Strategic Environment & Waste Policy
Department of Energy and Water Supply
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City East Qld 4002

Email: rachael.hanna@ehp.qld.gov.au

Dear Ms Hanna

Re *Biofuels Mandate Implementation - Proposed Sustainability Criteria*

1. Introduction

- 1.1 The Motor Trades Association of Queensland (MTA Queensland or the Association) responds to your request for consideration of the Department of Energy and Water Supply's (DEWS) biofuels mandate implementation - exemption guideline and related matters.
- 1.2 Thank you for consultations and documentation on the proposed exemption guideline and sustainability criteria. Our Service Station and Convenience Store Association (SSCASQ) membership have further considered the proposals and submit the following comments for your consideration.

2. Emerging Technologies

- 2.1 As indicated in discussions, it is the MTA Queensland's view that DEWS should include consideration of emerging automotive technologies in finalising the biofuels mandate implementation policy. The prediction is that over the next fifteen years most new motor vehicles will be autonomous. A report by McKinsey & Company "Automotive Revolution - Perspective Towards 2030" states 'that 15 percent of global automotive sales will be of fully autonomous cars, and the industry will continue to undergo massive technological changes.' Additionally, Telstra's chief scientist Hugh Bradlow 'predicted all vehicles on Australian roads would be driverless by 2030' warning at the same time that road builders must begin work to create smart roads to interact with them.
- 2.2 The indication is that in the medium to longer terms consumer preference will be for electric and hydrogen fuel cell vehicles causing a paradigm change in the automotive value chain that includes rationalisation in the fuel retailing market.

MTA Queensland

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- 2.3 The Federal Government recognises the changing automotive dynamics. Currently the National Transport Commission is in the process of considering responses to the 'Regulatory Options for automated cars' discussion paper. Its purpose was to understand how current regulations can support increased vehicle automation; identify legal barriers to automated vehicles; and support a nationally consistent regulatory framework for automated vehicles.
- 2.4 It is the SSCSAQ's view that DEWS, in determining the biofuels mandate compliance and exemption guideline must, recognise the change from fossil fuels as the main energy source for transportation and the progressive displacement of the internal combustion engine.

3 Information records

- 3.1 The batch record should be provided in a form that does not require additional record keeping or requests. This could be incorporated with the invoice process
- 3.2 As there are transitions in place for supply of compliant fuel the transition periods should apply to the fuel seller and the volume should be counted towards meeting the mandate over this period.
- 3.3 If there is a compliance issue after the event of the purchase of the fuel and provision of the batch statement the volume should still count toward meeting the mandate.

4 MTA Queensland background

- 4.1 The MTA Queensland is the peak organisation in the State representing the specific interests of businesses in the retail, repair and service sector of Queensland's automotive industry located in the State. There are some 13,000 automotive value chain businesses employing in excess of 90,000 persons generating in excess of \$14.5 billion annually. It is an industrial association of employers incorporated pursuant to the *Industrial Relations Act* of Queensland. The Association represents and promotes issues of relevance to the automotive industries to all levels of Government and within Queensland's economic structure.
- 4.2. The Association is the leading automotive training provider in Queensland offering nationally recognised training, covering technical, retail and the aftermarket phases of the motor trades industry through the MTA Institute (MTAI) - a registered training organisation. It is the largest automotive apprentice trainer in Queensland employing in excess of 35 trainers geographically dispersed from Cairns to the Gold Coast and Toowoomba and Emerald. The MTAI last financial year accredited courses to in excess of 1,600 apprentices and trainees.

5 Conclusion

- 5.1 Thank you for your inclusive consultations. We would be pleased to provide further comment on any matters in our submission that may require further clarification or amplification.

Thank you for your consideration.

Yours faithfully



Dr Brett Dale
Chief Executive Officer

Yours faithfully



Kellie Dewar
General Manager – Member Services