

1 February 2024

Department of Climate Change, Energy, the Environment and Water  
Fuel Quality Section  
[fuel.policy@dcceew.gov.au](mailto:fuel.policy@dcceew.gov.au)

To whom it may concern,

I write on behalf of Heavy Vehicle Industry Australia (HVIA) members in response to the consultation on developing a fuel quality standard to enable renewable diesel supply in Australia. HVIA is the peak body for heavy truck and trailer manufacturers and suppliers of technology, equipment, and services to the wider industry. Our 300-plus corporate members collectively employ a local workforce of over 70,000 staff.

We are supporting the industry on its decarbonisation journey and are harnessing the experience of members and stakeholders to resolve issues across regulation, policy, skills and training, and infrastructure. Whilst there is an exciting range of new heavy vehicles on the road and many others in development, it will take time for widespread adoption, and there is a need for more immediate solutions – which include renewable fuels – to reduce emissions.

As indicated in the consultation paper, diesel is a crucial energy source for the transport sector. It is important that the transport industry can access renewable diesel without time-limited approvals slowing down the process, and removing barriers will assist with further development of a renewable diesel market in Australia. We support efforts to do so in a manner that upholds quality standards whilst allowing for no-changes to the effective and efficient operation of a vehicle.

Regarding the stated approaches, Option 2 is preferred over Option 1. However, we are concerned about the approach to the declaration of the origin of fuels. We acknowledge that fuel quality standards regulate fuel parameters and to that end, we believe that using Section 19 alongside Regulation 73 would enable the new standard to include information about the fuel origin (i.e. renewable vs non-renewable). The relevant sections are outlined below.

***Section 19: Offence – supplying fuel without documentation***

- (1) *If:*
- (a) *a person (the supplier) supplies fuel in Australia to another person and the fuel is the subject of a fuel standard; and*
  - (aa) *in the case where the fuel standard specifies the circumstances in which the standard applies – the supplier supplies the fuel in Australia in those circumstances; and*
  - (b) *the supplier is a constitutional corporation or a Commonwealth entity or the supplier supplies the fuel in the course of constitutional trade or commerce; and*
  - (c) *the other person is not the end-user of the fuel;*
- the supplier must, within the period prescribed by the regulations, provide the other person with a document or documents containing:*
- (d) *a statement as to whether or not the fuel complies with the standard; and*
  - (e) *any other information relating to the fuel that is prescribed by the regulations.*

### **Section 73: Regulations**

*The Governor-General may make regulations prescribing matters:*

- (a) required or permitted by this Act to be prescribed; or*
- (b) necessary or convenient to be prescribed for carrying out or giving effect to this Act.*

Under Section 19(1)(e), a regulation could be created requiring the feedstock to be declared, allowing for a mechanism to demonstrate that the paraffinic diesel comes from renewable sources.

Our industry's transition to net zero will take time, but more than anything it will take a coordinated and determined effort across industry, Government, and relevant stakeholders. HVIA looks forward to working cooperatively with the Department to assist the transition of the heavy vehicle industry to a net zero future.

If you have any further questions regarding the above, please do not hesitate to reach out to Adele Lausberg, Chief Advocacy Officer at [a.lausberg@hvia.asn.au](mailto:a.lausberg@hvia.asn.au) or on 0415 225 638.

Yours sincerely,



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