

Thank you for the opportunity to provide a submission on the Department of Environment and Energy's *Consultation Paper on Mandatory Reporting of Petroleum Statistics*.

The RACQ represents a membership of 1.6 million Queenslanders and seeks to maintain the viability of motor vehicle transport on their behalf. This submission will focus on RACQ's use of the Australian Petroleum Statistics in advocating for our members and assessing and developing transport policy. The Australian Petroleum Statistics provide credible and authoritative data source that is well respected by stakeholders.

This submission will now address the key questions presented in the Response template.

Key Question 1: How do you use the Australian Petroleum Statistics?

RACQ uses the APS in our policy assessment and advocacy efforts.

The data presented in the following tables are frequently used:

- Table 3B – retail sales by state.
- Table 3A – national retail sales.

The following tables are used occasionally:

- Table 1A – crude production
- Table 2 – refinery input and production
- Table 4 – imports
- Table 4A – country of import origin
- Table 7 – days of cover
- Table 8a – international retail price comparisons

Table 3A and 3B are essential to RACQ's policy development and advocacy efforts. The recent removal of the LPG retail sales data split by state was disappointing. RACQ would like to see this data reinstated in Table 3B.

RACQ would like to see reporting of gaseous transport fuel and transport biofuels mandated. Reporting biofuel statistics is important in assessing the impact of the Queensland (and NSW) biofuels mandate. Including stocks of transport biofuels would increase the volume of fuel held and aid compliance with Australia's IEA obligations.

Key Question 2: The Design Principles and Options

RACQ supports the implementation of Option D. This option would provide the best possible data and enhance the value of the APS for policy assessment and development.

RACQ supports the mandatory reporting of stock on water and other non-IEA counted stocks.



It is RACQ's view that costs of meeting these obligations should be met by government and industry. RACQ would be concerned if any costs were passed on to consumers through higher fuel prices.

RACQ supports the widening of the mandatory reporting process to gaseous transport fuels and biofuels.

Key Question 3: Who Should Report?

RACQ agrees that the owner of the petroleum is the appropriate responsible entity. We do not see any reason why direct importers should be excluded and support the inclusion of major consumers in the end of month stock levels. We agree that the 3,000 tonne p.a. threshold is appropriate.

Key Question 4: What Data Should Be Reported?

In addition to the proposed mandatory reporting, RACQ would like to mandate the reporting of gaseous transport fuels and biofuels.

Key Question 5: How Should Data Be Reported?

In general, the format and reporting frequency of the current reports are appropriate.

In reporting consumption and sales volumes, where possible, all products should be reported as retail (forecourt sales) and bulk user sales.

The current reporting format and timing are appropriate.

Key Question 6: Data-Sharing

RACQ agrees with the principle of data sharing, providing that reporting entities are agreeable.

RACQ believes the mandatory reporting of fuel industry data is an important step in meeting Australia's IEA obligations. Detailed and credible statistics are critical for assessing and developing transport fuel policy.

RACQ appreciates the opportunity to comment on this paper.