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Andrew Ayton Department of Justice Consumer Building and Occupational Services 30 Gordons Hill Rd ROSNY Tas 7018

By email to andrew.ayton@justice.tas.gov.au

Dear Andrew

Consultation on the Implementation of the Gas Safety Act 2019 – Auto Gas Fitting

TACC is the peak industry body representing the retail automotive industries in Tasmania.

Thank you for the opportunity to comment on the consultation paper.

Under present arrangements with CBOS, TACC has for many years acted as an agent to sell LPG compliance plates and number plate stickers to LGP installers. Some years ago, that arrangement changed to include LNG compliance plates. TACC also sells LPG, LNG and EV number plate stickers to converters, new car dealers and owners of these vehicles. TACC generally arranges our own supply of number plate sticker, backing plate and rivets as a kit.

You would be aware LPG is no longer an economic fuel alternative with the improved performance of modern turbo internal combustion engines, the cost of LPG fuel since the imposition of excise and advances in electric vehicle technology. As a result, the industry now centres around maintenance and decommissioning of systems, rather than installations. In the last two years TACC only sold six compliance plates.

While the questions posed in the consultation paper are not contentious, we would warn that LPG installation and maintenance are now a marginal business with most of the licenced fitter now not participating and unlikely to renew their licences. This leaves LPG vehicle owners and licensing authorities in a difficult position.

The only exception to this may be LPG driven forklifts, which we would think will also be at risk.

Discussion points

1. Is the automotive gas-fitting work compliance plate sufficient and appropriate?

Having consulted TACC members we are advised the current compliance plate detail is appropriate and no changes are recommended.

2. Should automotive gas-fitting compliance plate be sold through Service Tasmania outlets?

Members did not have a position on this matter. They are ok with purchasing from either Service Tasmania or continuing to purchase from TACC. The only comment was that given the very low numbers of installations they would not want to have to commit to the purchase of five plated at a time.

TACC as the current reseller of the plates presently have a stock of 35 LPG and 17 LNG plates that will be made obsolete. TACC has been happy to assist CBOS and our members to distribute the plates but have no objection to the distribution system changing.

3. Should labels be made available with automotive gas-fitting compliance plates?

Yes, but most of labels sold in the past have been to members, consumers, and Service Tas for vehicles where the number plate has changed over new installations.

Most labels we now sell are the EV labels to motor dealers.

4. Is the automotive gas-fitting return sufficient and appropriate?

Yes, but industry has always had concern about the need to provide CBOS this information and industry compliance and enforcement. Past discussions with CBOS revealed this information was not recorded and no information was able to be derived from these returns, questioning its purpose.

5. Of the two options for returns, what would you prefer?

Industry believes an online form would be preferable. With so few installations no one wants to purchase a book with multiple pages.

TACC is happy to work with CBOS for the best outcome for industry, but we warn that with extremely low demand for installations and existing converted vehicles declining, the industry is very fragile and CBOS should tread lightly to retain those license installers that remain.

Yours sincerely,

Malcolm Little General Manager