

Review of the National Trade Measurement System

Submission Template for Industry Stakeholders

Instructions for Completion:

1. It is requested that this template be used by industry stakeholders making a submission to the Review of the National Trade Measurement System. While submissions in any format will be accepted and considered by the Review Team, provision of the following basic information in the format shown will greatly assist in the analysis of responses.

Additional information can be attached to the submission.

2. Before making a submission, industry stakeholders are encouraged to read the Discussion Paper which is available from the MCCA website.
3. Submissions should be sent to: trade_measurement@bah.com or posted to:
Trade Measurement
c/- Booz Allen Hamilton
Level 7, 12 Moore Street
Canberra ACT 2601
4. The closing date for submissions is **30th June 2006**.

Review of the National Trade Measurement System

Submission Template for Industry Stakeholders

Item 1. Responding Organisation Profile

Organisation Name	Australian Institute of Petroleum Ltd
Postal Address	GPO Box 279, Canberra, ACT 2601
Contact Name	Nathan Dickens
Position	General Manager - Policy
Telephone	0262473044
Email	ndickens@aip.com.au

The organisation is a (tick relevant boxes):

<input checked="" type="checkbox"/>	Peak Industry Body representing...	specify industry Downstream Petroleum Industry
<input type="checkbox"/>	Manufacturer or supplier of trade measurement instruments.....	specify type (eg. non-automatic weighing, fuel dispensers, beverage dispensers etc.)
<input type="checkbox"/>	Owner or operator of trade measurement instruments.....	specify type (eg. non-automatic weighing, fuel dispensers, beverage dispensers etc.)
<input type="checkbox"/>	Licensed certifier of trade measurement instruments.....	specify type (eg. non-automatic weighing, fuel dispensers, beverage dispensers etc.)
<input type="checkbox"/>	Packaging company.....	list goods
<input type="checkbox"/>	Bottling company.....	list goods
<input type="checkbox"/>	Weighbridge operator	specify whether publicly or privately operated
<input type="checkbox"/>	Retailer in.....	list jurisdictions
<input type="checkbox"/>	Wholesaler in.....	list jurisdictions

The organisation employs (tick one):

<input checked="" type="checkbox"/>	Less than 50 staff
<input type="checkbox"/>	More than 50 staff

Item 2. Impact of Current Administrative Arrangements

Through previous reviews a number of concerns have been raised with the current arrangements for the administration of trade measurement in Australia. Of those concerns, which of the following have an impact on your industry or business? (tick appropriate boxes)

<input checked="" type="checkbox"/>	Differences in legislation between States and Territories
<input checked="" type="checkbox"/>	Requirement to consult multiple jurisdictions for approval of new selling methods
<input checked="" type="checkbox"/>	Requirement to obtain licences from multiple jurisdictions
<input type="checkbox"/>	Collection of certification fees on behalf of government
<input type="checkbox"/>	Inconsistent advice from government agencies
<input checked="" type="checkbox"/>	Different enforcement regimes in different jurisdictions
<input type="checkbox"/>	Different cost recovery arrangements in different jurisdictions
<input type="checkbox"/>	Poor access to services in rural or remote areas
<input type="checkbox"/>	Lack of Australian Government's capacity to enter into mutual recognition arrangements in the trade measurement area
<input checked="" type="checkbox"/>	Lack of a national focus on trade measurement policies and issues.
<input type="checkbox"/>	Slow response to changes in international requirements
<input type="checkbox"/>	Slow response to changing technology
<input checked="" type="checkbox"/>	Lack of harmonisation with New Zealand
<input type="checkbox"/>	Other (pleased specify)

Comments

(How do these arrangements impact on your industry or business? What are some practical examples of impacts that you would like to see addressed?)

See comments under Item 3.

For practical examples of the impacts of current arrangements on the business activities of the downstream petroleum sector, see the Submission to this review from Caltex Australia (an AIP member company).

In total, what do you assess as the overall impact of these issues on your business, or the business of our constituents? (tick appropriate box)

<input type="checkbox"/>	Identifiable...	You recognise the issues but could not quantify the impact on your business
<input type="checkbox"/>	Measurable...	You can quantify the impact, but there would be little benefit to your business if the issues were resolved.
<input checked="" type="checkbox"/>	Realisable.....	There would be a significant benefit to your organisation if the issues were resolved.
<input type="checkbox"/>	Transferable..	There would be a significant benefit to your organisation if the issues were resolved AND that benefit could be passed-on to consumers or clients

Item 3. Towards a National Trade Measurement System

The benefits to your organisation of each of the following options (as described in Section 4 of the Discussion Paper) would be: *Identifiable, Measurable, Realisable* or *Transferable* (tick appropriate box for each initiative listed)

Option		Identifiable	Measurable	Realisable	Transferable
1	National legislation based on UTML	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
1	Consistent Administration Acts	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Full national trade measurement legislation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	National licensing scheme for certifiers of instruments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	National legislation with contracted administration	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	National legislation and administration	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments:

(Which of the options is most likely to address the adverse impacts of the current trade measurement arrangements on your industry or business? Why?)

AIP member companies play various roles in each segment of the fuel supply chain across Australia. They include the four major (refiner/marketer) oil companies who operate all of the petroleum refineries in Australia, handle a large proportion of the wholesale fuel market and have a presence in the retail market.

At the broad level, AIP strongly supports national approaches to legislation and regulation, since harmonised/rationalised regimes inevitably result in lower transaction, administration and compliance costs for our businesses, compared to differing jurisdictional approaches. Reducing complexity and streamlining arrangements also benefits all market participants, and provides more certainty for operational and planning purposes – particularly where business models extend beyond State/Territory boundaries (like for AIP member companies). Consequently, AIP supports, in principle, National legislation and administration (Option 4).

Item 4. Trans-Tasman Harmonisation

The benefits to our organisation of each of the following initiatives for achieving trans-Tasman harmonisation would be Identifiable, Measurable, Realisable or Transferable (tick appropriate box for each initiative listed)

	Identifiable	Measurable	Realisable	Transferable
Harmonised legislation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Common inspection and certification procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Joint enforcement and information sharing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Bi-national agency for trade measurement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Any additional comments would be welcomed and should be attached.

Should you have any questions in relation to this submission, or require additional information from AIP, please contact Nathan Dickens (General Manager – Policy, AIP) on (02) 6247 3044 or via email on ndickens@aip.com.au.

Thank you for the opportunity to participate in this Review.

AIP member companies have also made submissions to this Review, and those submissions reinforce the conclusions identified here and also provide advice on the practical/commercial impacts of the current regime on their business activities.

Background

AIP was established in 1976 as a non-profit making industry association. AIP's mission is to promote and assist in the development of a sustainable, internationally competitive petroleum products industry, operating efficiently, economically and safely, and in harmony with the environment and community standards.

Thankyou for taking the time and effort to respond.