



7 January 2011

Dan Murphy  
Deputy Chief Inspector  
Petroleum and Gas Inspectorate  
Department of Employment, Economic Development and Innovation  
Level 16, 61 Mary Street  
Brisbane QLD 4002

Via email: [lidia.vidovic@deedi.qld.gov.au](mailto:lidia.vidovic@deedi.qld.gov.au)

## **Proposed amendments to the Petroleum and Gas (Production and Safety) Regulation 2004**

Dear Mr Murphy

The Australian Pipeline Industry Association (APIA) welcomes the opportunity to comment on the Department of Employment, Economic Development and Innovation's proposal to amend the Petroleum and Gas (Production and Safety) Regulation 2004.

APIA is the peak national body representing the interests of Australia's transmission pipeline sector. APIA's current membership is predominantly involved in high-pressure gas transmission. APIA's members include contractors, owners, operators, advisers and engineering companies and suppliers of products and services.

APIA's supports the overarching aim of the proposed amendments and considers that initiatives to harmonise regulation to achieve consistency are positive developments that will enhance national efficiency and reduce compliance burdens.

In regards to the specific amendments, APIA offers the following comments:

### **Section 81**

APIA supports the introduction of mandatory usage of Dial Before You Dig and considers this has the potential to substantially reduce third party interference of gas transmission pipelines.

### **Exclusion of excavation activities conducted by pipeline owner and/or operator**

From the current wording of Section 81, it appears that a pipeline owner or operator would be required to use the Dial Before You Dig service unless the excavation is one of those activities covered under 81C(2). APIA suggests that 81C(2) includes an explicit exclusions for all excavation activity undertaken by the pipeline owner and/or operator.

### **Exemption from obtaining relevant pipeline information if someone else has**

81D(2) provides an exemption for a person to obtain relevant pipeline information if someone else has already done it and passed that information on.

To encourage good practice among contractors, many pipeline owners and operators require that all contractors obtain their own information, irrespective of whether this information has been sought by others previously for planning or other purposes. This assists in the Dial Before You Dig process becoming a standard part of all excavation activity and not seen as a significant burden.

It also removes any ambiguity or confusion over whether or not the information needs to be obtained and lessens the potential for claims that it was believed another party had undertaken the task.

APIA recommends 81D(2) be removed from the amendments.

If you would like to discuss these comments further, please call Steve Davies on (02) 6273 0577.

Yours sincerely



STEVE DAVIES

Policy Adviser

on behalf of

CHERYL CARTWRIGHT

Chief Executive