ACAPMA
Australasian Convenience and Petroleum Marketers Association

26 May 2026

Department of Climate Change, Energy, the Environment and Water
Fuel Standards and Programs | Liquid Fuels Operations and Analysis Branch
Fuel.Policy@dcceew.gov.au

Consultation on fuel quality measures under the National Fuel Security Plan - Industrial Diesel

Introduction

Thank you for the opportunity to comment on the options being considered under Level 3 of the National Fuel Security Plan (NFSP).

Fuel Standard

ACAPMA supports the proposal to temporarily align with the United States' sulphur limit of 15ppm, the proposed cetane index of 40, and density proposal without changing the flashpoint of 60.5C.

Supply

The Consultation Paper correctly identifies that it is highly unlikely that the new standard of diesel would be sold through service stations (as there would be no appetite to operate two separate supply chains) and that use is most likely to be limited to 'off road' uses.

At Level 3, under a possible scenario of broader 'on road' use of industrial diesel, care would need to be undertaken in the design in how this could be implemented. There will be potentially some significant challenges, particularly in supply and storage.

Implementation

ACAPMA welcomes the proposal that the quality parameters for conventional diesel, paraffinic diesel, or conventional diesel blends will not be altered.

Labelling

It is very important that users are advised that they need to check with the original equipment manufacturer (OEM) before they purchase and/or use industrial diesel. Warning labels should applied at the terminal gate.

If consideration is being given to going to Level 3 under the NFSP, ACAPMA would appreciate being involved in the design of any warning signs and messages in the retail setting.

ACAPMA
Australasian Convenience and Petroleum Marketers Association

Conclusion

From ACAPMA's perspective, if the intent is to support industry mobility and improve supply resilience without compromising heavy vehicle or industrial reliability, then we would be broadly supportive of these proposals. However, far more detailed work would need to be undertaken on moving to Level 3 and how this would impact Australia's fuel distribution and retail fuel network.

Thank you again for the opportunity to comment on the Consultation Paper.

Yours sincerely

Rowan Lee
Chief Executive Officer