
From: Anthea Middleton <[REDACTED]>
Sent: Friday, 3 July 2015 9:44 AM
To: [REDACTED]; biofuels
Cc: Penelope Twemlow
Subject: Bio Fuel Discussion Paper

Hi Benn,

It was great to meet you on Wednesday. Penelope and I have read the Bio Fuel discussion paper and although we aren't able to add much from a technical perspective, it did raise some initial questions around workforce impacts. The areas that we believe should be explored once you are ready to build a formal bio fuel policy are:

- From a workforce planning perspective:
 - The Biofuel Mandate wants to 'stimulate the development of, and investment in, a sustainable biofuels industry in Queensland' – from a workforce perspective it must be developed appropriately first, including subject matter experts in both Government and supplier organisations. These workers will need to provide coaching and mentoring during the development and transitions phases, as well as conduct the governance and compliance components post-development and implementation. Therefore, **does the State Government currently have auditing and assessment staff? If so, are these easy to fill job roles? Considering their increased requirement under the Bio Fuel discussion paper, it is important to understand if there are enough content matter/technical experts to audit how liable parties are complying with the new legislation.**
 - As with the above, are there like roles currently employed by the biofuel wholesalers and retailers to ensure they can comply with the implementation principles?
- From a training perspective:
 - Are there sufficient training courses and providers to sustain the development and implementation of the biofuel industry? If not, what timeframes are required to have these in place?
- From a 'settings' perspective:
 - Will smaller retailers, if included in the mandate, have the manpower and/or capability (systems) to provide quarterly reports? If not, what initiatives need to be put in place to develop these skills?
 - Does the Department have the systems and resources to monitor and implement actions from the reports and the data contained within them?
 - Will smaller retailers be able to comply with penalty provisions?
 - Is this mandate unsustainable or forcing smaller operators 'out of the market'?

I thought I would email our feedback to you directly given the nature of our response, and we are happy to be involved in further discussions if you feel that would add value.

Kind regards,
Anthea.

Anthea Middleton
Workforce Planning Manager
Energy Skills Queensland

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