



16<sup>th</sup> December 2016

**Dr Peter Fisk**

Chief Executive and Chief Metrologist  
National Measurement Institute (NMI)  
36 Bradfield Road,  
Lindfield, NSW 2070

Ref: Density Measurement in the retail sale of LPG

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Dear Dr Fisk,

I am the writing on behalf of DJ Batchen Pty Ltd, the leading supplier of LPG dispensers in Australia for over 40 years. We have been a significant exporter of LPG dispensing technology for over 20 years. We have supplied complete LPG dispensers to Indonesia, Philipines, Hong Kong, Fiji, Mauritius, Malaysia, Peru, Paraguay, Turkey, Bulgaria, India, Bangladesh, Iran, Thailand, Taiwan, South Korea, China, Ghana as well as metering components to Europe and North America.

In all other countries we have exported, Australia is the only one to require mandatory Density compensation, yet all these countries have LPG specifications similar if not identical to Australia. Australia is the only country in the world to my knowledge who applies this mandatory requirement to LPG dispensers.

As demonstrated by our export success, we have world leading metering technology, but are placed at a significant disadvantage in our home market, due to the requirement to fit a density probe that is unreliable and expensive to supply and maintain. In 2016 we have supplied approx. 25 LPG dispensers into the Australian market and to date have replaced 16 units under warranty during this period. These have all been replaced due to readings outside the allowed density range. To date not one of these units has been replaced by the manufacturer of the device, who has claimed corrosion has caused premature failure. This is despite no fault found with any other component in the system, and in some cases being in service less than a week. This means that we are significant disadvantage to our competitors, despite having world leading technology. In many parts of Australia, the supply chain uses a fixed density, yet we still have to provide a device that provides zero benefit to the consumer. In many parts of the country LPG is supplied to underground storage which has very small temperature variations winter to summer, yet we have a mandatory requirement to fit a device that has a proven poor performance track record.

It is now likely that we will cease producing dispensers for the local market due to the high cost of servicing density probes with the consequent loss of manufacturing jobs in Australia due to NMI mandating a requirement that no other market in the world applies. The accuracy of the dispenser can be maintained with using a fixed density and temperature correction back to 15 C, as it is in every other market we service throughout the world.

Yours Faithfully,

James Batchen

Managing Director