



**AUSTRALIAN  
AUTOMOBILE  
ASSOCIATION**

Our Ref: 15/121

July 2004

Clean Fuels and Vehicles Section  
Department of Environment and Heritage  
GPO Box 787  
**CANBERRA ACT 2601**

**Constituent Members**



Dear Sir

I refer to the request for comments on the Discussion Paper on Diesohol.

As the autoclubs do not have sufficient technical expertise in this specialised field we cannot provide detailed comments on the issues and questions raised in Part B of the discussion paper. The comments provided previously, as part of our responses to both the discussion paper No.6 “National Standards for Biodiesel” and the more recent discussion paper; “Measuring Cetane Number”, are still relevant as they outline the Australian Automobile Association’s policy position on alternative diesel fuels.

The AAA supports the introduction of fuel quality standards for alternative fuels where the aim of the standard is to ensure supply of a suitable quality of fuel that will result in a vehicle operating to its design parameters including;

- vehicle continue to meet the required emission standards,
- no degradation of vehicle performance and
- no adverse impact on vehicle warranties.

The discussion paper summarises the information readily available in terms of emissions and vehicle operability (Section 4.3 Impacts of Diesohol) however, the paper does acknowledge there are gaps in knowledge. Areas of concern to the AAA are;

- The capability of a Euro 3 or Euro 4 engine operating on diesohol continuing to meet the Euro 3 or Euro 4 emission standards.
- Effect on fuel consumption from diesohol.
- Effect on fuel system and engine components with long term use of diesohol.

All of these issues have been part of the debate with the use of ethanol in petrol and it would be advantageous in terms of market and consumer confidence to have these issues resolved prior to the introduction of a diesohol standard.

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One of the objectives of the Fuel Quality Standards Act is to provide information about the fuel when the fuel is supplied at retail sites. Quality of fuel and the other appropriate information is an important issue for motorists. Polling conducted for the AAA showed that one third of motorists looked for particular quality of fuel and almost two thirds of motorists had doubts about ethanol in petrol.

Consequently, the AAA supports the approach outlined in Section 5.4; introduce a fuel quality standard under the Fuel Quality Standards Act. Parameters to ensure the required standard of diesohol throughout the country is required as many diesel engine vehicles, both heavy vehicles and passenger vehicles (e.g. four wheel drives) travel from state to state in either the course of their normal business or for tourism.

If you have any further questions on this matter I may be contacted on (02) 6261 4408.

Kind regards

James Hurnall  
**DIRECTOR TECHNICAL**