

Our Ref: JLM: 15/23c

15 August 2003

Mr Daniel Sheedy
Clean Fuels and Vehicles Section
The Department of the Environment and Heritage
GPO Box 787
CANBERRA ACT 2601

FAXED
15/8/03



AUSTRALIAN
AUTOMOBILE
ASSOCIATION
(AAA)

Dear Mr Sheedy,

Thank you for the opportunity to comment on the Commonwealth Position on a Proposed Standard for Fuel Parameters (Biodiesel) as outlined in the August 2003 paper. As you are aware the Australian Automobile Association (AAA) submitted a response to National Fuel Quality Standards – Biodiesel, Discussion Paper No.6.

The AAA supports the approach taken in the Commonwealth's preferred position in terms of both;

- A proposed Australian biodiesel fuel quality standard; and
- Biodiesel blends.

The AAA supports the need for labelling as outlined in our submission to the discussion paper;

- Proportion of biodiesel in the blend, i.e. B5, B10.
- Warning about an increase in fuel consumption (if applicable).
- Warning on possible effects to vehicle operability and warranty (if applicable).

The proposal in Table 3 goes some way to meeting these standards; however, a minimum blend of 5% before any labelling is required is not acceptable. While there may be a practical limit for a biofuel blend the proposed standard of 5% is too high. Discussion Paper No.6 contained information from a number of vehicles and engine manufacturers was that use of any biodiesel, in some cases less than 5%, would not be endorsed by the manufacturer or would void warranty.

The same level of public information that is being made available at the pump for the use of ethanol blends of up to 10% in unleaded petrol should also be available for any biodiesel blend. This includes manufacturer's information on which vehicles/engines are acceptable for use with relevant biodiesel blends.

To ensure public confidence in biofuels of all kinds, including biodiesel, is maintained there must be advice to consumers of the amount of biofuel contained in any blend and if this is acceptable for use with their vehicle.

Yours sincerely

Handwritten signature of Lauchlan McIntosh in black ink.

Lauchlan McIntosh
EXECUTIVE DIRECTOR

Constituent Members



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