



30th March 2008

Comment on Australian National Standard for Biodiesel Discussion Paper

This document provides commentary on Section 4.1 “Emissions” from the National Standard for biodiesel Discussion Paper (Paper 6) and also referenced in section 8.2 “Impacts on Emissions” where “*Stakeholders are requested to comment on the impacts of blending biodiesel with diesel on engine operability and vehicle emissions.*”

Comment

While it is clear that there are certain emissions benefits through the use of biodiesel blends, there are also emissions challenges presented by their use. In particular, the increased production from biodiesel of oxides of nitrogen (NO_x), a major component of smog, should be addressed by any regulation concerning the use of biodiesel.

According to the United Nations Intergovernmental Panel on Climate Change (IPCC) NO_x has a Global Warming Potential (GWP) of 296 versus CO₂'s GWP of 1. Thus any increase in NO_x emissions is nearly 300 times more hazardous than an increase in CO₂, not to mention the other effects of increased smog on the health of our citizens and the beauty of our cities. The study by the US EPA (figure 4.1) referenced on page 15 in the report shows 100% biodiesel produces 10% more NO_x from heavy-duty highway engines is a grave concern. Even a 2% increase in NO_x from a B20 blend would have a significant negative impact on the Australian environment.

We believe the Australian National Biodiesel Standard ought to include a requirement to include NO_x “offsets” in the standard that will limit NO_x emissions from the biodiesel fuel to the same or better levels than standard diesel fuel. We believe this could be achieved by the proper combination of biodiesel feedstock, the amount of biodiesel blended with regular diesel and through the use of fuel additives to lower the production of NO_x. In addition, no fuel additive package should further reduce fuel economy by more than one percent, and any additive that improves fuel economy in biodiesel should be given priority.

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