

## **Cummins Comments to the Biodiesel Discussion Paper.**

4<sup>th</sup> Feb, 2007.

### **Overall comments.**

- Cummins certifies engines to prescribed USEPA and European certification fuels.
- While Cummins has much data on the impact to emissions with the use of biodiesel blends, it is not in a position to guarantee any emissions outcome.

### **3.1**

- Density going outside spec, while a theoretical possibility, is not very likely now. Most fuel companies are producing diesel at the bottom end of the density limit, top end density diesel seems to have disappeared with the advent of low sulphur diesel.

Comments invited etc.

Should biodiesel blends be capped at B5 and meet the diesel standard?

- B5 provides a blend that most engine suppliers are ok with
- Yes, a B5 blend should meet the diesel standard
- Cummins position is that B100 biodiesel meets either ASTM D6751 or EN14214.

Should flexibility be allowed for density (or any other quality parameter)?

- No. Per above comment, there should be no need.

Is option 1 or option 2 your preferred management option?

- Cummins preferred position is B5 at this point in time, we need to be aware that there is much work by Cummins and other companies in higher blends going on now.

### **3.4**

- If we are going to progress a higher blend than B5, then we need post-blending quality standards.

Comments invited etc.

Should a full B20 fuel quality standard be developed as outlined in option 3?

- Simple position is yes, engine manufacturers need to work to a standard, just as we do for 100% petrodiesel

- It should meet the EMA position, a cut down version does not meet the needs of the engine industry. Flash point should be adjusted to Australian flash point requirements.

Your comments are invited on other fuel quality management options for biodiesel blends:

- B20 is coming and will be more wide spread, work done now should allow for this.
- B20 is also available, but of questionable quality in many cases.
- B5, B20 and B100 are the logical fuels to consider

## 4.2

B5 should only be allowed if it meets the diesel standard and the biodiesel also meets the standard. We need to drive to fuel quality standards.

B5 should be labeled, and the statement “up to 5% biodiesel” is sufficient.

Higher blends will need to be sold meeting a new specification (Cummins preferred position is the EMA spec). So labeling is no so much of an issue, as the fuel will not come out of the diesel pump. B20 should be treated as a unique fuel.