

Freedom Fuels is a marketer in both the Petroleum Retail and Petroleum Commercial side of the fuel industry. We have branded our blended Diesel as Elite Diesel with up to 20% bio-diesel. Elite Diesel meets and or exceeds the Fuel Quality Std for Diesel which is the basis of my remarks.

After reading the discussion paper the below comments are our reply -

1. Management Options Propose –
  - Option 1, 2, 3 & 4 are unacceptable as we support the current guidelines of either you met the Diesel standard or not.
  - By creating a B20 std you immediately offer the opportunity for EOM's and or the majors to give a blanket NO or segregate B20 where currently we sell Diesel with a component of Bio-diesel that meets the Diesel spec.
  - I do not support another product being introduced (B20) to create confusion and myth's in the market place.
  - Once we offer another std and alter density levels we start to give ground that this new product B20 is not infact Diesel??
2. Other Management Options –
  - Yes maintain a vigorous testing regime like what currently occurs with E10 products with significant fines for the retailer and or wholesaler.
  - Enforce ATO licensing of blending/manufacturing facilities.
  - Legislate to enforce retained records of test results for each batch of either Bio-diesel or blended products. A batch changes when either the Diesel or Bio-diesel product varies.
3. Labelling –
  - All blends 5% and under should not require labelling as long as the Bio-diesel meets std.
  - Blends above this level should be advertised as to contain a portion of Bio-diesel.
  - Any product that does not meet Diesel Std must be clearly labelled with warnings.

By maintaining our current legislation is gives clarity to claiming Tax Credits and rebates. The emphasis is for the producers to meet spec all the time and for blends to be verified with test certificates. This strong position must run in line with the Petroleum Industry in general to ensure confidence is maintained.

We cannot afford an industry that has been littered with producers that do not met std's all the time but due to economic reasons sold product.

Any changes in legislation are to ensure we can stand side by side with Diesel and offer a superior product long term.

Regards,

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