

Dear Committee Members,

There has been some good discussion and points raised concerning the labelling of proposed biodiesel fuel blends. Much of this discussion has focussed on the need to mitigate the incidence of damage to vehicle engines which is understandable. I believe however that given that the issue at hand is that of labelling, the purpose of which is essentially to make the consumer aware of changes in an existing product that would otherwise not be expected by the average consumer; we are not talking about a label warning of the already known and understood issues surrounding normal diesel fuel.

Many of these issues are certainly to do with the effect of these blends on a motor but they are not limited to that. There are certainly issues of handling, safety, storage, health effects that may require mention on a label. As an example, I would compare this change to the diesel fuel with the change from leaded petrol to unleaded petrol. When the lead was removed and chemical substitutes were added, this unleaded petrol became a much more hazardous substance for prolonged skin contact. Contact with petrol by the skin is very common in the automotive service industry and petrol is often used as a cleaning solvent for hand cleaning greasy parts or indeed greasy hands. While this added hazard was required to be mentioned and added to the Materials Safety Data Sheets there were no requirements for product labelling to include mention of the increased hazard and this still exists today. I think this was not done simply because it would make the 'new' fuel more difficult to promote and be accepted by consumers.

A similar situation may exist for biodiesel blends. Let's say that a blend was based on the addition of a peanut oil methyl ester, which is possible: Do we have the clinical data to establish that this form of peanut oil or its resulting combustion by-products do not present a risk to those suffering from an acute allergy to peanuts?

Finally I have a concern which might be labelled as an ethical one which is relevant to me and probably to a significant number of consumers from different ethical and religious sections of our community. The issue concerns the proposed use of animal tallow in a commodity product that hitherto has not been the case. I personally, being a vegetarian, would not choose to use a fuel which is based on slaughtered animals and I would certainly like the opportunity to be informed of this on a label, to help me in my decision. Now while my ethical concerns are my own, I would point out that there are large sections of our community who would not like to use particular animal products based on their religious beliefs. I believe that these groups' concerns need to be taken into consideration. If you look at much of the food labelling these days you will see that much of the industry has moved away from using gelatine, rennet and animal fats in their processed foods with a view to capturing a much broader market sector. There is mandatory labelling requirements for most food products and so it is difficult to 'hide' the use of such animal by-products from the market sectors that would avoid these. In the case of diesel fuel, the average consumer would definitely not expect it to contain by-products from the slaughter industry and so it would be remiss to not mention this on any proposed label with a view to 'tricking' the otherwise concerned consumers into using this product.

Quite large sections of our community might also be willing to use fuel derived from slaughtered animals but only if that by-product is certified to meet some religious requirement such as being 'Halal'. It is most unlikely that these by-products so used would meet that certification and so once again it would be proper to label these products to make this clear. You will notice that all footwear includes labelling to indicate whether leather or synthetic materials are used and these are usually very specific for the reasons stated above.

So in summary, while most of the labelling concerns lie within the scope of your Department I feel it would be prudent and proper to have other Departments such as Health and Cultural Affairs involved in making the decision as to what information is included on any proposed labelling schemes so we do not have a situation where we end up with 3 or more labels.

Sincerely

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