

Western Australian Renewable Fuels Association

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Re: Standardising Diesel / Biodiesel Blends

The Western Australian Renewable Fuels Association Inc supports the introduction of standards for the blending of diesel and biodiesel, in accordance with the following:

Options 1 and 2.

Option 1, where the density of the blend must meet the Diesel standard would make it difficult for biodiesel based on Tallow to comply. We do not support Option 1.

Option 2 is preferred, as it allows a wider range of biodiesel feedstocks to be used for blending,. This does not preclude the provision of higher percentage blends of biodiesel. Blends of less than 4% biodiesel should be treated as diesel and not carry the label “B5”.

Option 3 and 4.

Option 3 would impose a heavy burden on blenders and is not recommended.

Option 4, where the abbreviated / simplified tests can be performed relatively cheaply would provide the best compromise, provided that the feedstock diesel and biodiesel comply with their relevant standard. This in conjunction with Option 2, and provision for higher Bxx Blends including B100 is supported by WARFA.

We propose that limits of 18 – 20% biodiesel be set so that the public are assured of getting what they are paying for. A blend of 6% is NOT B20 and should not be allowed to be marketed as such.

The simplified testing, using Gas Chromatograph facilities where appropriate should provide the following information:

- Actual % Biodiesel in the blend.
- Non – Diesel , Non – Biodiesel content,
- Total Acid Number,
- Oxidation Stability, Cold Filter Plugging Point,
- Water content,
- Appearance (clear and haze free),
- Solids content.

Labelling

Biodiesel blends with diesel should show, within a relatively narrow margin, the actual percentage of biodiesel in the blend. Allowing the labeling B6 as B20 is fraudulent and will encourage the use of watered down blends with reduced environmental benefits for Australia. Similarly, labeling a B1 blend as B5 should not be permitted.

WARFA recommends that B5 should contain no less than 4% biodiesel. Blends of less than 4% biodiesel can be effectively considered as diesel and should meet all diesel specifications.

It is not difficult to measure the amount of B100 to add to a load of fuel to make up a tank of diesel to a particular ratio. Simple mathematics can be used to achieve a particular blend ratio even when transitioning from one fuel ratio to another.

Label for B5. "Contains between 4% and 5% Biodiesel"

Label for B20 "Contains between 18% and 20% Biodiesel"

Label for B100 "Contains more than 95% Biodiesel"

Cautions Notice for B20 and above "Users the user should contact the manufacturer to verify the blend is a suitable fuel for their engine"

Where CFPP of the blend (including B100) is higher than Diesel supplied for that area, a notice indicating the CFPP for the Blend.

Summary:

- WARFA supports the imposition of blending standards, as long as they are imposed to ensure that the consumer gets what they buy.
- Options 2 and 4 appear to provide enforceable standards which are not onerous to verify (by the blender and by the regulatory authorities), but the provision of B100 should not be restricted.
- Testing of blends at the bowser could be achieved in a way similar to the regular checking by "weights and measures" inspections. This would be too infrequent for quality assurance, so a means of checking of the fuel should be imposed, so that the Consumer can be assured of product, which meets specification.
- Blends of less than B4 should be considered as Diesel and meet all Diesel Specifications, including density.
- B5 Blends should be between B4 and B5 and be labeled as containing between 4% and 5 % biodiesel.
- B20 blends should contain between 18% and 20% biodiesel and be labeled as containing between 18% and 20% biodiesel.
- Higher biodiesel blends (eg B100) should be allowed and labeled accordingly.
- Cautionary notices for B20 and above should indicate that the user should contact the manufacturer to verify the blend is a suitable fuel for their engine.

- All blends of B20 and above should be labeled with their CFPP where this is higher than the diesel supplied for that area.

AR Clark

Chairperson

Western Australian Renewable Fuels Association Inc.