

Comment on the proposed Standard for Fuel Parameters (Biodiesel)  
Commonwealth Position - August 2003

**National Standards Commission**

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We have read the proposed standard and do not wish to comment on the specification for the fuel however we are of the view that some mention should be made about the approvals for the fuel dispensers that may be used for dispensing biodiesel.

Currently the Commission examines instruments and approves them for the fuels and flowrates nominated by the manufacturer of the instrument. At this point in time there are no approvals where the instrument manufacturer has nominated biodiesel. The Commission can only act to vary a certificate of approval if the instrument manufacturer requests the variation. This means that for fuel dispensers that are currently in existence and approved for petroleum products a variant would be required to include biodiesel and this variant application would need to be made by the manufacturer of the fuel dispenser. In many cases with older fuel dispensers the manufacturer would either not be willing to apply for a variant to an old approval OR would no longer be in business. If this were the case and the owner of the instrument wished to apply for approval then this is possible however it is highly likely that the older fuel dispensers would not comply with the current design requirements for approval making approval of older instruments unlikely.

It must be made clear that the responsibility for the application for approval of a fuel dispenser for dispensing biodiesel rests with the manufacturer/distributor of the fuel dispensers.

The Commission cannot force fuel dispenser manufacturers/distributors to apply for approval for a variation for biodiesel it is entirely a matter for the fuel dispenser manufacturer/distributor.