

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

**Transport SA**

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I have reviewed the proposed standard for biodiesel and for the most part am happy with what has been put forward. The use of the ASTM methods for testing is highly desirable.

One point that still causes me concern is that the Cold Filter Plugging Point has not been set for implementation until 18/09/2004. While I agree with the comment that the limit needs to be developed for Australian Conditions through testing, enough data currently exists to define a permissible range, should this not be defined it will allow biodiesel manufacturers to potentially make fuel that can gel within tanks. (this is a real concern with some of the less reputable manufacturers)

Furthermore the exclusion of the cold filter plugging point places greater responsibility on the consumer to ensure that their vehicle will still operate in colder conditions if using biodiesel. TSA has been advised by one of its vehicle manufacturers that it would have to install fuel heater units to ensure fuel delivery.

As TSA is also a purchaser of biodiesel fuel (although in small quantities) and in our experience it has been essential that the cold filter plugging point be as close to that of the standard petroleum distillate. As a minimum, perhaps a where there is a large variation (beyond 2-3 degrees) it should be a requirement for the consumer to be notified, and the fuel labelled accordingly.

Another issue lies with the fact that no provision has been made to mandate a biocide agent within Biodiesel. I feel that this could cause the quick demise of biodiesel within Australia. To my knowledge all trials within Australia (with the exception of Adelaide's trial) have had serious problems with bacterial growth in the fuel often causing the vehicles to be fail in service. (A stigma surely not wanted for a new fuel). Those trials conducted with biocide agents present in the fuel have run without fault.