

# BUSINESS GUNNEDAH INC

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Environment Australia  
Atmosphere and Sustainable Transport Branch  
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Canberra ACT 2601

22 May 2003

Dear Sir

**Re: National standard for biodiesel**

Thank you for the opportunity to respond to the Setting National Fuel Quality Standards: Paper 6: National Standard for Biodiesel. Members of our group have examined the paper, and would like to offer the following comments

3.2 Feedstocks

- production technologies for biodiesel to remove glycerol should preference ethanol as opposed to methanol as the alcohol source in biodiesel production

5.3 Biodiesel Blends

- Biodiesel needs to be economically attractive in order to encourage use. Excise tax concessions in relation to rural and regional benefits of a domestic fuel source should be considered

6.19 Alcohol Content

- In determining alcohol content of blended diesel product, allowance should be made for a future fuel comprising of ethanol, biodiesel and diesel.

6.25 Flash Point

- a future diesel fuel could be a mixture of low sulphur diesel, biodiesel for lubricity, and ethanol at say 10-20%. Ethanol with its higher flash point would help in this situation as opposed to methanol. (It is understood that John Deere is testing and trialing ethanol/ diesel blend fuel in agricultural/ industrial engines in the USA).

7.7 Alcohol

- Internationally, the derivatives of methanol feedstock's are less preferred as opposed to renewable, biodegradable ethanol, this would be expected to increase with some bans in place already (MTBE). Captive fleet use of biofuel diesel as in, shire councils, bus fleets or in a marine situation may require the maximization of environmental positives of any fuel source selected.

10.6 Labelling

- Lessons should be learnt from the inaccurate ethanol misinformation press, Biodiesel labelling needs to apply and to explain the positives.

Yours sincerely

Geoff Hood